

c. In the end, of the 76 original suspect SWMU sites, 51 actually turned out to be actual locations (See Tab A for the final list of 51 sites). Investigation of those remaining sites continued and as new potential release sites were discovered, they too were added to the Fort Bliss list and investigated, as funding became available.

4. **INFORMATION ON INDIVIDUAL SITES**

This detailed information on each individual site is presented as enclosure (1 to 4) to Tab B (Individual Site Closure Information). The closure information on each site is presented in the following sequence:

- a. Site Name, SWMU Number (if it is a SWMU) and Fort Bliss (FTBL) Number
- b. Summary of Site Risk
- c. Purpose of Remedial Action (if required)
- d. Documentation of Investigation
- e. Documentation of Closure Decision by State Environmental Agency.
- f. Declaration

5. Please direct any questions concerning this document and the information it contains to: Director, Directorate of Environment, ATTN: ATZC-DOE MM, Bldg. 624, Taylor at Pleasonton Road, Fort Bliss Texas 79916-6812.

(b) (6)

Colonel, AD  
Garrison Commander

**Attachments:**

Tab A: List of SWMU #s with Fort Bliss (FTBL) #s.

Tab B: Individual Site Closure Information

Enclosure # 1, Decision Document on SWMU # 16, FTBL-028

Enclosure # 2, Decision Document on SWMU # 65, FTBL-036

Enclosure # 2: Decision Document on SWMU # none, FTBL-070

Enclosure # 2: Decision Document on SWMU # none, FTBL-072

Enclosure # 2: Decision Document on SWMU # none, FTBL-081

Tab C: List of Sites Requiring Five-Year Reviews

**Cf.**

TRADOC IRP Section (Holsinger) w/ attachments

Individual Site File w/ Cover Letter and Decision Document for that site

**Enclosure # 1**  
**Decision Document on SWMU # 16,**  
**FTBL-028**

## Memorandum for Record

**SUBJECT: Remedial Action Decision Document for FTBL-028**

### SITE NUMBER AND DESCRIPTION

Rubble Dump Spill Site Near Site Monitor, SWMU 16, FTBL - 028

FTBL-028 is a area of illegal dumping, roughly 200 feet either side of a one mile section of El Paso Electric Company power line road. The discarded material was spread in many small piles throughout the site. It is located north and west of Montana Street a major thoroughfare that runs along side the east boundary of the military reservation. (Site photo attached). The illegal dumpsite covered about an 24 are and the date of the original dumping is unknown.

### SUMMARY OF SITE RISK

Standard household, landscaping, and light construction waste and trash generated by unknown civilian personnel and contractors were dumped across this site. The site was designated as a SWMU due to the presence of asbestos containing roofing material and areas of soil contaminated with discarded petroleum products (used engine oil being suspected). The media of concern at this site were soil and groundwater.

### PURPOSE OF REMEDIAL ACTION

The purpose of the remedial action at this site was first to prevent further illegal dumping and second to remove all discarded material to the maximum extent possible. Site access was restricted by the erection of 2.5 miles of 4-strand barbed wire fencing and the establishment of an earthen berm 3 to 4 feet high behind the fence. In addition warning signs were placed every 200 LF along the fence. Next all asbestos containing material and stained soil were collected and disposed up in authorized landfills IAW current federal and state regulations. Then the non-regulated trash and debris were picked up and deposited in local civil landfills. Confirmatory soil samples were taken and tested as part of the Response Action Completion Report (RACR) that was sent to TNRCC requesting site closure.

### DOCUMENTATION OF INVESTIGATION

FTBL-028, SWMU # 16, Rubble Dump Spill Site Near Site Monitor, Environmental Science & Engineering, Inc., USACOE-Dallas, October 1983, Installation Assessment of the Headquarters, US Army Air Defense Center and Fort Bliss, Report No. 335, U.S. Army Environmental Hygiene Agency, August 1987, Interim Final Report - Hazardous Waste Evaluation of Solid Waste Management Units at Ft Bliss, A. T. Kearney, Inc., Chicago IL, USACOE-Dallas, March 1989, RCRA Facility Assessment, FR/VSI Report, Ft Bliss, Texas, US Army Environmental Hygiene Agency, September 1989, Final Report Evaluation of Solid Waste Management Units, Fort Bliss, Texas, Golder Associates, Inc, USACOE-Houston, July 1997, Final Report Preliminary Site Investigations, Golder Federal Services, Inc., USACOE-Ft Worth, July 1997, Preliminary Site Investigation Draft Report (B-1116, B-2019, Rubble Dump, & McGregor Borrow Pit), Golder Associates, Inc, USAOCE-Fort Worth, September 1997, Final Report - (Draft) Review of Site Characterization, Rubble Dump/Spill Site, Texas Natural Resource Conservation Commission, April 1998, Site Characterization, Rubble Dump/Spill Site, Final Report (Draft), Texas Natural Resource Conservation Commission, December 1998, Standard Operating Procedure for Disposal of Regulated Asbestos Containing Material, Golder Associates, Inc, USACOE-Ft Worth, January 1999, Appendices - Site Characterization Rubble Dump/Spill Site, Golder Associates, Inc., USACOE-Ft Worth, January 1999, Final Report - Site Characterization Rubble Dump/Spill Site, Ft Bliss, Texas, ENCON, Inc, El Paso, March - September 1999, Project Background Information on Montana Cleanup, ENCON, Inc, El Paso, Texas, July 1999, Contract on Rubble Dump Spill Site, ENCON, Inc, El Paso, Texas, September 1999, Amendment of Solicitation/Modification of Contract for Rubble Dump Spill Site, ENCON, Inc, El Paso, Texas, September 1999, Statement of Work Rubble Dump Spill Site, Near Site Monitor - FTBL-028, ENCON, Inc, El Paso,

Texas, September 1999, Statement of Work Rubble Dump Spill Site Clean up Contract, November 1999, Memorandum - Environmental Evaluation of Erecting Fence along Reservation Boundary, December 1999, Categorical Exclusion, Clean-up Rubble Site & Construct Fenceline Near Site Monitor, ENCON International, Inc, El Paso, Texas, August 2000, Environmental Services Contract Site Closure Report - Rubble Dump Site, RF Weston, March 2001, Response Action Completion Report for Rubble Dump Site Near Site Monitor (SWMU 16), USAADACENFB Letter to TNROC, 9 April 2001, Transmittal of Response Action Completion Report for Rubble Dump Site Near Site Monitor (SWMU 16).

## DOCUMENTATION OF CLOSURE DECISION BY STATE ENVIRONMENTAL AGENCY

On 23 April 2001, the Texas Natural Resource Conservation Commission acknowledged receipt of the Response Action Completion Report and promised a closure decision on or before 1 July 2001.

## DECLARATION

- I. The selected remedy (*remove all hazardous material and all trash and debris*) is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this site and is cost effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility or volume as a principal element and utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable.
- II. Because this remedy will not result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, the five-year review will not apply to this action.

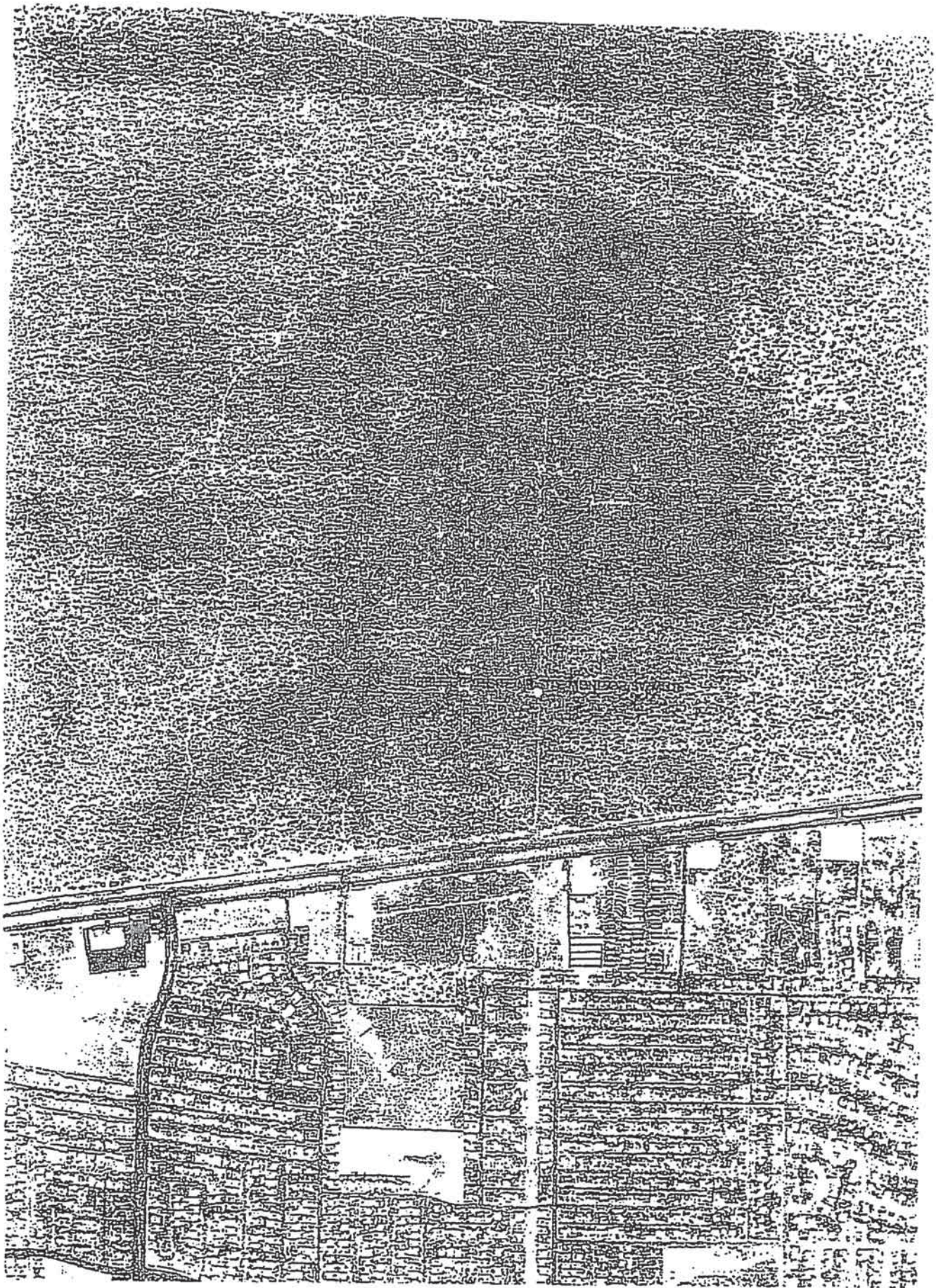




THE REPRODUCTION  
OF THE FOLLOWING DOCUMENTS  
CANNOT BE IMPROVED DUE TO THE  
CONDITION OF THE ORIGINAL









Robert J. Huston, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Kathleen Hartnett White, *Commissioner*  
Margaret Hoffman, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 21, 2002

(b) (6)

DERA Program Manager  
Directorate of Environment  
Headquarters, U.S. Army Air Defense Artillery Center and Fort Bliss  
1733 Pleasanton Road  
Fort Bliss, Texas 79916-6816

Re: Ft. Bliss  
TCEQ Solid Waste Registration No. 63003  
TCEQ Hazardous Waste Permit No. HW-50296  
EPA ID No. TX4213720101  
Final Response Action Completion Report for Rubble Dump Site (SWMU 16) Near Site Monitor,  
dated March 2001  
Ft. Bliss Response Letter to Request for Additional Information, dated November 1, 2002  
Approval of Response Action Completion Report - No Further Action Required  
Texas Risk Reduction Program Remedy Standard A - Residential

Dear (b) (6)

The (TCEQ) received your Remedial Action Completion Report (RACR) on April 12, 2001, indicating that remediation activities have been completed in accordance with the TCEQ Texas Risk Reduction Program (TRRP) Remedy Standard A - Residential pursuant to Title 30 Texas Administrative Code (TAC) Chapter 350.

In order to attain TRRP Remedy Standard A, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health and ecological based standards and criteria. In order to be released from the requirement to file an institutional control in accordance with 30 TAC §350 Subchapter F, contaminants that remain in place in media of concern (i.e., soil, ground water, surface water, air) must not exceed residential protective concentration levels (PCLs).

The TCEQ has completed a review of the RACR. In addition, the TCEQ has also reviewed the Ft. Bliss letter of November 1, 2002, received on November 8, 2002, which includes the laboratory data sheet for the Synthetic Precipitation Leaching Procedure (SPLP) results for the soil sample with the highest concentrations of lead and cadmium. TCEQ requested this information (which had been omitted from the RACR) via e-mail communication on October 28, 2002. The RACR documentation indicates that TRRP Remedy Standard A Residential PCLs have been achieved at the Rubble Dump Site (SWMU 16) such that no institutional control or post-closure care is required. Ft. Bliss is released from filing an institutional control and from post-closure care requirements. In addition, TCEQ has received your publisher's affidavit stating that Fort Bliss published notice of corrective measures (complete removal of all contaminants) for the Rubble Dump Site (SWMU)-016, on June 2, 2002, in the El Paso Times. TCEQ did not receive any comments during the sixty



(b) (6)

November 21, 2002

Page 2

day comment period. With fulfillment of the public notice requirements, TCEQ can issue final approval for remediation of the Rubble Dump Site.

Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual remediation fails to comply with these requirements, the burden remains upon Ft. Bliss to take any necessary and authorized action to correct such conditions. A TCEQ field inspector may review your Final Report and conduct a closure inspection of the site.

Questions concerning this letter should be directed to me at (512) 239-2332. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TCEQ Region 6 Office in El Paso. The TCEQ Solid Waste Registration Number and Unit Description should be referenced in all submittals.

Sincerely,

(b) (6)

DSMOA Program Manager  
Corrective Action Section  
Remediation Division  
Texas Commission on Environmental Quality

AP/ap

cc: Waste Program Manager, TCEQ Region 6 Office, El Paso

Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Dan Pearson, *Executive Director*



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## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

April 6, 1998

(b) (6)

Chief, Multimedia Compliance Division  
Directorate of Environment  
1733 Pleasonton Road  
Fort Bliss, TX 79916-6816

Re: U.S. Army Air Defense Artillery Center and Fort Bliss  
Hazardous Waste Permit No. 50296; Solid Waste Registration No. 63003  
EPA Permit No. TX4213720101  
*Site Characterization, Rubble Dump/Spill Site, Final Report (Draft), September 1997*  
Notice of Approval with Modifications

Dear (b) (6)

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed the Site Characterization Report for the Rubble Dump/Spill Site (Report), which was received on December 8, 1997. The Report: a) provides site assessment information characterizing the waste piles and contaminated shallow soils which resulted from illegal trespass and dumping by the public, and; b) recommends disposing of the wastes (roofing tar paper, floor tiles, landscaping rock, concrete, yard brush, tires, glass, empty paint cans, and household trash) at appropriate landfills and then installing a barbed wire fence to prevent future illegal dumping at the site.

As a result of this review, the TNRCC approves of the proposed corrective measures for restoring the site provided that they are revised to:

1. Include an evaluation of the soil sample analytical data that meets the Risk Reduction Standard 2 (RRS 2) requirements. This requires:
  - a) evaluating if the media of concern should be investigated for other contaminants (such as, metals, polychlorinated hydrocarbons, pesticides, etc.) in addition to the volatile and semivolatile organic compounds (VOCs and SVOCs).
  - b) evaluating other exposure pathways by which human populations or environmental receptors are likely to be exposed to contaminants, as required by Title 30 Texas Administrative Code (TAC) Section 335.556 (b);

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: [www.tnrcc.state.tx.us](http://www.tnrcc.state.tx.us)

printed on recycled paper using soy-based ink

(b) (6)

Page 2 of 3  
April 6, 1998

- c) selecting appropriate RRS 2 Media Specific Concentrations (MSCs) as per Title 30 TAC Sections 335.559 (f) and (g) (for example, in Table 6, the Groundwater Protection (GWP) values should have been identified as the RRS 2 MSCs instead of the "SAI" values);
  - d) documenting that the nondetect SVOCs in those samples with sample quantitation limits (SQLs) significantly greater than the practical or method quantitation limits (PQLs/MQLs) meet RRS 2 MSCs (repeated, compounds that are not detected because the sample SQLs are elevated due to contamination must be evaluated to insure that the elevated SQLs meet the RRS cleanup levels for the compounds);
  - e) verifying that the RRS 2 cleanup levels for the soil contaminants are based on current toxicity data and MCLs (this is necessary because the RRS 2 MSCs provided in Title 30 TAC Section 335.568 are based on 1992-1993 information), and;
  - f) confirming that a RRS 2 cleanup level could not be calculated for any site contaminant not listed in Title 30 TAC Section 335.568 by verifying that toxicity information and a toxicity surrogate substitution method do not exist for the contaminant (see Title 30 TAC Section 335.553 (e)).
2. Include a final report which provides the required information showing attainment of RRS 2 as stated in 30 TAC Section 335.553 (a). The final report shall include but is not limited to descriptions of procedures and conclusions of the investigation to characterize the nature, extent, direction, rate of movement, volume, composition and concentration of contaminants in environmental media; basis for selecting environmental media of concern; documentation supporting selection of exposure factors; descriptions of removal or decontamination procedures performed in remediation; summaries of sampling methodology and analytical results which demonstrate that contaminants have been removed or decontaminated to applicable levels; and a document that the person proposes to use to fulfill the requirements of Title 30 TAC Section 335.560 (b). Please be advised that the final report needs to clearly characterize the contamination, as stated above, to background or PQL levels.
- Finally, please remember that RRS 2 requires that all waste, waste residuals, leachate, and contaminated media be removed and/or decontaminated to standards and criteria such that any substantial present or future threat to human health or the environment is eliminated.
3. Post "NO DUMPING" signs along the barbed wire fence.

(b) (6)

Page 3 of 3  
April 6, 1998

At this time, the TNRCC directs Fort Bliss to provide a letter, within 90 days of the date of this letter, indicating how and when the comments will be addressed. If you have any questions regarding this matter, please contact Mark Arthur of the Federal Facilities Team at (512) 239-2362, mail code MC127.

Sincerely,

(b) (6)

Manager, Corrective Action Section  
Remediation Division

PSL:ma

cc: (b) (6) EPA Region 6  
TNRCC Region 6  
Corrective Action Section





**DBS JOINT VENTURE**  
**COURTYARD 1**  
**7500 JEFFERSON NE**  
**ALBUQUERQUE, NM 87109**  
**(505) 823-1000; FAX (505) 821-0692**

July 10, 1997

(b) (6)

Engineering Manager  
US Army, Corps of Engineers  
Attn: CESWF-ED-MR/Kasten  
P.O. Box 17300  
Ft. Worth, TX 76102

Re: Submittal of Copies Final Report Preliminary Site Investigations Ft. Bliss, Texas

Dear (b) (6)

Enclosed you will find the copies of the Final Report Preliminary Site Investigations conducted at Ft. Bliss, Texas. The individual sites in this Preliminary Site Investigation include the following:

1. Solvent Spill Under Building No. 1116
2. Dry Cleaner Solvent UST Building No. 2019-UNICOR
3. Ruble Dump Site
4. McGregor Borrow Pit Drum Burial Site (NM)

We appreciate the opportunity to work with the Ft. Worth District Environmental Group and the Directorate of Environment at Ft. Bliss Texas.

If you have any additional questions or require any additional information, please do not hesitate to contact us.

Sincerely

(b) (6)

Joint Venture Manager  
DBS Joint Venture

GAW/dc  
Enclosure

cc:

(b) (6)

- Golder Associates Inc.  
Golder Associates Inc.  
Directorate of Environment - Ft. Bliss Texas

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## 5.0 RUBBLE DUMP SITE

### 5.1 Description of Field Activities

On November 4 and 10, 1995, samples were collected at the Rubble Dump Site as part of a PSI in order to determine the nature and extent of potential contaminants of concern associated with the two reported releases of petroleum/oil/lubricant (POL) and/or septic material, construction debris (specifically roof shingles), and to provide a preliminary assessment of any hazardous materials or contaminants present in the dumping area. The site is located along Power Line Road, southeast of Biggs Army Air Field, east of the El Paso Airport, and north of Montana Road. Two previous reports of release events at the site were documented in the USAEHA 1988 survey and during a July 1989 site survey (Ft. Bliss/WPI-3.8, 2/26/90). The two releases include: 1) release of an unknown liquid which covered an estimated area of 50 feet by 100 feet, and 2) release of POL which covered an estimated one-mile stretch along both sides of Power Line Road. The documentation does not include specific information on where the spills were located along Power Line Road.

Prior to the detailed site survey of the dumping area, aerial photos from two different sources were reviewed. The first aerial photos of the area were obtained from a group within Fort Bliss but did not reveal enough detail of the site to identify any release areas. In addition, a 1986 aerial photo comprised of approximately two-thirds to three-quarters of the area investigated, was obtained from the City of El Paso, Planning, Research and Development Department. The scale of this photo was better and four separate possible release areas west of Power Line Road were identified on the aerial photo.

Field activities were conducted in accordance with the Sampling and Analysis Plan (October 1995) except for the following changes: 1) only fifteen surface soil samples were collected; 2) only thirteen different construction debris (roofing material, floor and ceiling tiles, etc) samples were collected; and, 3) sampling locations equally spaced along Power Line Road as described in the Sampling and Analysis Plan were not collected. A fewer number of samples were collected than stated in the Sampling and Analysis Plan because field observations suggested that a smaller number of samples collected were adequate for a preliminary assessment of the site.

The main area of the detailed site survey covered an area approximately 1.5 miles north-south along Power Line Road and 100 feet to the east and west of Power Line Road. In some cases, the distance to the west extended as far as 500 feet from Power Line Road. The areas surveyed at greater distances from the road were determined by field observations or suspect areas on the 1986 aerial photo. Ninety percent of the unauthorized dumping appeared to be within 100 feet from the east and west edges of Power Line Road. The additional ten percent of the unauthorized dumping occurred at greater distances from Power Line Road as observed in the field and on the 1986 aerial photo.

During November 2 through 4, 1995, the site survey was conducted in the following manner. Colored pin flags were utilized to mark the potential sample locations. The highest priority category was marked with pink flags and included possible asbestos shingles, other construction debris which might contain asbestos, solvent cans, paint cans, and other debris which might contain regulated substances. The medium priority category was marked with orange flags and it included other roofing materials, other construction debris, and any other debris which may be of concern.



The lowest priority category was marked with green flags and it included other types of household items which may be of concern. A 100-foot grid was set up along Power Line Road so that estimated locations could be determined when marking sampling locations and other information on a map.

It is estimated from the detailed site survey that 80 percent of the material dumped along Power Line Road is construction and/or demolition debris. The remaining 20 percent consists of household trash, empty paint cans, empty solvent cans, broken glass, landscaping debris, plastic, furniture, wood and other miscellaneous household trash.

Two of the four dark stained areas previously reported, were found in the detailed site survey of the area. Two additional dark areas on the 1986 aerial photo were checked in the field to determine if a release was the potential cause of the discoloration detected on the photo. The field check confirmed this making a total of four different release areas observed and sampled in the field.

Fifteen soil samples (RDS-1 through RDS-11, and RDS-25 through RDS-28) were collected from black stained soil associated with releases of POL or other unknown liquids, and from beneath burnt construction debris. Thirteen samples (RDS-12 through RDS-24) were collected from roofing shingles and other construction materials. Sample type and location details are presented in Table 6. All sampling locations are illustrated on the index map for approximately two-thirds of the area of investigation for the Rubble Dump Site in Figure 3. The map only illustrates part of the area of investigation because no samples were collected north of power pole #9. The index map is broken down into four additional figures (Figures 4 through Figure 7) to illustrate more detail and sample location numbers.

### 5.2 Sample Analyses

All samples were submitted to an approved ACOE MRD laboratory for analyses. Soil samples RDS-1 through RDS-11 and RDS-25 through RDS-28 were submitted for VOC analysis by EPA SW 846 Methods 5030/8260, SVOC analysis by EPA SW 846 Method 8270, total petroleum hydrocarbons (TPH) by EPA Method 418.1, and oil and grease by EPA Method 413.2. Samples RDS-12 through RDS-24 were submitted for asbestos analysis by EPA Method 600/R-93/116. A trip blank, sample RDS-29 was submitted for VOC analysis by EPA SW 846 Methods 5030/8260. A minimal level of data validation was performed on the data. This included verification of requested deliverables and verification that holding times were met for extraction and analyses. No other validation, transcription or calculation checks were performed.

### 5.3 Analytical Results

The detectable concentrations of all analytes are presented in Table 7. The organic and inorganic qualifiers are defined at the bottom of Table 7. VOCs were detected in samples RDS-25 and RDS-26. Naphthalene concentrations in these samples ranged from 5 to 7 µg/kg. Methylene chloride was detected in the trip blank sample (RDS-29) at 230(E) µg/kg. It is possible that this compound is a lab contaminant and not actually present in the sample.

SVOCs were detected in samples RDS-5, RDS-6, RDS-7, RDS-10, RDS-11, and RDS-25 through RDS-28. Ranges of concentrations for detected SVOCs are as follows: ND to 2600 µg/kg bis(2-ethylhexyl) phthalate; ND to 9900(E) µg/kg naphthalene; ND to 75000(E) µg/kg phenanthrene; ND to 16000(E) µg/kg fluoranthene; ND to 28000(E) µg/kg pyrene; ND to 8800(E) µg/kg benzo[a]anthracene; ND to 8700(E) µg/kg chrysene; ND to 140(J) µg/kg di-n-octyl phthalate; ND



to 8400 µg/kg benzo[b]fluoranthene; ND to 250 µg/kg benzo[g,h,i]perylene; ND to 21000(E) µg/kg 2-methylnaphthalene; ND to 5300 µg/kg acenaphthene; ND to 8000(J) µg/kg fluorene; ND to 13000(E) µg/kg anthracene; ND to 1500(E) µg/kg benzo[k]fluoranthene; ND to 7500(E) µg/kg benzo[a]pyrene; ND to 2000 µg/kg indeno[1,2,3-cd]pyrene; ND to 1300 µg/kg dibenz[a,h]anthracene; ND to 14000(J) µg/kg acenaphthylene; and, ND to 1700 µg/kg butylbenzyl phthalate.

TPH and oil and grease were detected in samples RDS-1 through RDS-5, RDS-7, RDS-8, RDS-10, RDS-11 and RDS-25 through RDS-28. The TPH concentrations ranged from ND to 3700 mg/kg and the oil and grease concentrations ranged from ND to 7690 mg/kg.

Asbestos was detected in samples RDS-19 and RDS-21. The asbestos type detected in both samples was chrysotile and the percentages detected were 25% and 60%, respectively.

#### 5.4 Summary and Recommendations

A summary of field observations and analytical results is as follows:

- asbestos was identified in floor tiles but not roofing materials as originally expected;
- the asbestos floor tiles were randomly scattered across the site;
- all the roofing material appeared to be the same type and the samples collected did not contain asbestos;
- four POL releases were observed on the west side of Power Line Road and sampled,
- naphthalene was detected in two samples from one POL release area;
- a wide range of SVOCs were detected in seven of the 15 samples from the POL release areas;
- TPH and oil and grease were detected in 13 samples from the POL release areas;
- it is possible that these POL release areas may be older than originally suspected, as suggested by the absence of VOCs; and,
- soil samples were not analyzed for metals, pesticides, herbicides and PCBs.

Based upon the PSI results for this site, the limited data set suggests there are data gaps for metals, pesticides, herbicides and dioxins for the releases areas and there may be additional release areas which have not been identified. The TNRCC does not set action level concentrations (i.e. a specific concentration, that when exceeded, requires remedial action) for those VOCs, SVOCs, TPH, and oil and grease identified at the Rubble Dump site. For comparison purposes, the identified compounds are related to "Medium Specific Concentrations for Health-Based Closure/Remediation" identified in Chapter 335, Subchapter S (Risk Reduction Standards) of the Industrial Solid Waste and Municipal Hazardous Waste Code set by the TNRCC and to "Risk-Based Concentrations" (Smith, 1995) established by the EPA. This comparison is made per the request of Ft. Bliss, Directorate of Environment draft report review. As shown in Table 8, RDS-10, a stained soil sample, is above EPA's residential land use standard for benzo[a]anthracene, benzo[b]fluoranthene, benzo[a]pyrene, and indeno[1,2,3-cd]pyrene but below the commercial/industrial land use standard. In addition, sample RDS-10 exceeds both residential and commercial/industrial land use standards for dibenz[a,h]anthracene.

Other compounds which were detected in the soils but are below both residential and commercial/industrial land use standards for the TNRCC and/or EPA are:

- *indeno[1,2,3-cd]pyrene*
- *naphthalene*
- *bis(2-ethylhexyl)phthalate*
- *benzo[a]anthracene*
- *chrysene*
- *benzo[b]fluoranthene*
- *fluoranthene*
- *pyrene*
- *di-n-octyl phthalate*
- *benzo[k]fluoranthene*
- *benzo[a]pyrene*
- *acenaphthene*
- *fluorene*
- *anthracene*
- *butylbenzyl*
- *dibenz(a,h)anthracene*

The following compounds are not listed in the TNRCC's "Medium Specific Concentrations for Health-Based Closure/Remediation" table or EPA's "Risk-Based Concentration" table:

- *phenanthrene*
- *benzo[g,h,i]perylene*
- *asbestos*
- *2-methylnaphthalene*
- *acenaphthylene*
- *various TICs*
- *TPH*
- *oil and grease*

This comparison with TNRCC's "Medium Specific Concentrations for Health-Based Closure/Remediation" and EPA's "Risk-Based Concentrations" is not presented in lieu of a risk assessment and does not make inference to how clean or contaminated the site is based on these values. It is strictly for comparison purposes only and should not be used or interpreted as a risk assessment.

The recommendations listed below are in order of highest priority. Additional site investigation activities can be stopped at any time if it is determined that the contaminants do not pose an environmental risk. The following activities are recommended at the Rubble Dump Site: 1) perform a higher level of data validation to verify analytical results; 2) remove the construction debris which contains asbestos and dispose of it according to regulations; 3) collect additional soil samples from the four known release areas and analyze them for metals, PCBs, pesticides, dioxins, and herbicides; 4) obtain additional aerial photos prior to and after 1986, if possible, to identify additional suspect release areas and verify the additional suspect release areas in the field, if any; 5) if aerial photos are not available to assist with identifying possible release locations, then a detailed site survey may have to be extended to greater distances away from Power Line Road; 6) evaluate all construction debris at the site to determine if any additional asbestos containing construction debris is present, since the asbestos results for the floor tiles suggest that roofing material is not the main construction debris of concern for asbestos; 7) determine a screening action level so that a risk assessment can be conducted in order to determine if any of the contaminants will pose a risk to human health or the environment; 8) collect additional samples, if required, to adequately define any newly identified release areas; and, 9) if the contamination for any release area is determined to be a risk, then a remedial action plan can be prepared to adequately address the issues.



TABLE 6  
RUBBLE DUMP SITE SAMPLE LOCATIONS

DATE COLLECTED	SAMPLE ID	SAMPLE DESCRIPTION	APPROXIMATE SAMPLE LOCATION	COMMENTS
11/4/95	RDS-1	Black stained sand with dark gray crust on surface of sand; 0 to 8 inches bgs	220 feet N of pole #2 and 84 feet W of road	Photo #A-8; PID = 0.0 ppmv
11/4/95	RDS-2	Orange sand below the stained sand at a depth of about 1 ft bgs	220 feet N of pole #2 and 84 feet W of road	PID = 0.0 ppmv; Photo #A-7 - overview of stained area
11/4/95	RDS-3	Black stained sand with black crust on surface of sand; 0 to 6 inches bgs	180 feet N of pole #2 and about 220 feet W of road	PID = 0.0 ppmv; Photo #A-8
11/4/95	RDS-4	Orange sand below the stained sand at a depth of about 1 ft bgs	180 feet N of pole #2 and about 220 feet W of road	PID = 0.0 ppmv; Photo #A-8
11/4/95	RDS-5	Black stained sand with oily odor and dark stained gravel	400 feet N of pole #2 and 1 to 2 feet W of road	Photo #A-9; PID = 0.0 ppmv
11/4/95	RDS-6	Black stained sand and concrete with crusty residue on sand	525 feet N of pole #3 and 2 to 3 feet W of road	Photo #A-10; PID = 0.0 ppmv
11/4/95	RDS-7	Black stained sand with oily odor and black crust on surface; 0 to 2 inches bgs	180 feet N of pole #4 and 25 to 30 feet W of road	Photo #A-11; PID = 0.0 ppmv
11/4/95	RDS-8	Surface 0.5 inches of sand was not stained, next 1.5 inches of sand was stained black; 0.5 to 2.0 inches bgs	185 to 190 feet N of pole #4 and 40 to 45 feet W of road	Photo #A-12; PID = 0.0 ppmv
11/4/95	RDS-9	Black oily stained sand; 0.0 to 1.5 inches bgs	300 feet N of pole #5 and 45 feet W of road	Photo #A-13; PID = 0.0 ppmv
11/4/95	RDS-10	Grayish brown crust with black stained sand, 2 ft by 3 ft area; crust was very solid and difficult to break; 0 to 0.5 inches bgs	299 feet N of pole #5 and 40 feet W of road	Photo #A-14; PID = 0.0 ppm
11/4/95	RDS-11	Burned yellow styrofoam or plastic with bad odor; underlying sand was stained gray to black; 0 to 1.5 inches bgs	555 feet N of pole #7 and 25 feet W of road	Photo #A-14; PID = 0.0 ppm
11/4/95	RDS-12	Black tar paper and roof shingles	680 feet N of pole #3 and 10 to 15 feet W of road	Photo #A-15
11/4/95	RDS-13	Black roof shingles	80 to 95 feet N of pole #4 and 88 to 70 feet W of road	Photo #A-16
11/4/95	RDS-14	Red, green and black roof shingles	270 feet N of pole #4 and 25 feet W of road	Photo #A-17
11/4/95	RDS-15	Black and white roof shingles	455 feet N of pole #4 and 80 feet W of road	Photo #A-18
11/4/95	RDS-16	Dark brown and black roof shingles	455 to 480 feet N of pole #4 and 50 feet W of road	Photo #A-19
11/4/95	RDS-17	Black roof shingles	200 feet N of pole #5 and 50 feet W of road	Photo #A-20

TABLE 6  
RUBBLE DUMP SITE SAMPLE LOCATIONS

DATE COLLECTED	SAMPLE ID	SAMPLE DESCRIPTION	APPROXIMATE SAMPLE LOCATION	COMMENTS
11/4/95	RDS-18	Black roof shingles (visible fibers)	380 feet N of pole #5 and 40 feet W of road	Photo #A-21
11/4/95	RDS-19	White with multicolored spot floor tiles, some tiles have black backing	485 feet N of pole #5 and 55 feet W of road	Photo #A-22
11/4/95	RDS-20	Black roof shingles (visible fibers)	580 feet N of pole #5 and 25 feet W of road	Photo #A-23
11/4/95	RDS-21	Black floor tile	380 feet N of pole #2 and 9 to 8 feet E of road	Photo #A-24
11/4/95	RDS-22	White wall board or ceiling tile found with other construction debris	187 feet N of pole #2 and 15 feet W of road	Photo #A-25
11/4/95	RDS-23	Yellowish brown material with black back, found with other types of construction debris	185 feet N of pole #2 and 15 feet W of road	Photo #A-26
11/4/95	RDS-24	Black, unknown type of construction material, found in same pile as broken tiles and shingles	500 feet N of pole #1 and 75 feet W of road	Photo #A-27
11/10/95	RDS-25	Black stained sand	440 to 450 feet N of pole #3 and 40 feet W of road	Identified on 1988 aerial photograph from City of El Paso Planning Dept.
11/10/95	RDS-26	Black stained sand	450 to 460 feet N of pole #3 and 510 to 515 feet W of road	Identified on 1988 aerial photograph from City of El Paso Planning Dept.
11/10/95	RDS-27	Black stained sand	80 feet N of pole #6 and 215 feet W of road	Identified on 1988 aerial photograph from City of El Paso Planning Dept.
11/10/95	RDS-28	Black stained sand	50 feet N of pole #8 and 290 feet W of road	Identified on 1988 aerial photograph from City of El Paso Planning Dept.

## Notes:

road = Power Line Road

pole #1 = Power Pole #1

N = North

W = West

E = East



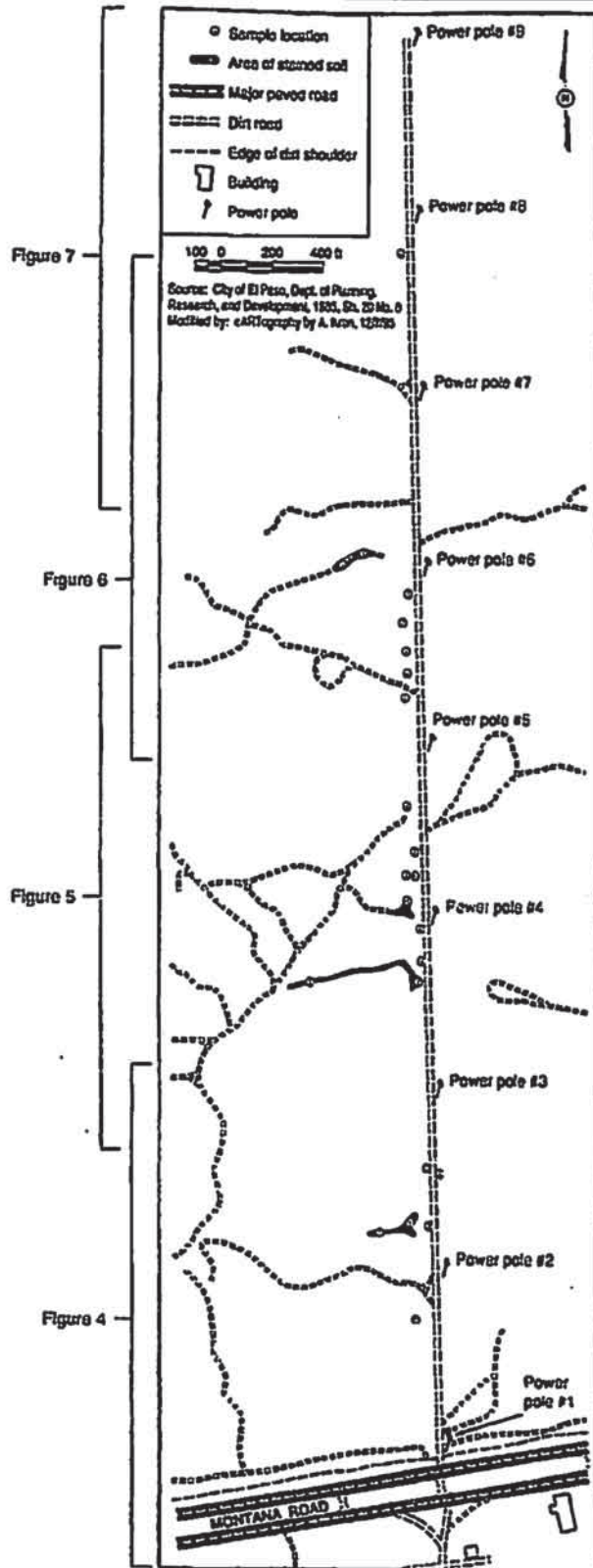


Figure 3. Index map for area of investigation at the Rubble Dump Site, Fort Bliss, Texas.  
 GOLDBER ASSOCIATES INC. FOR DBS JV/BOHANNAN-HUSTON, INC.

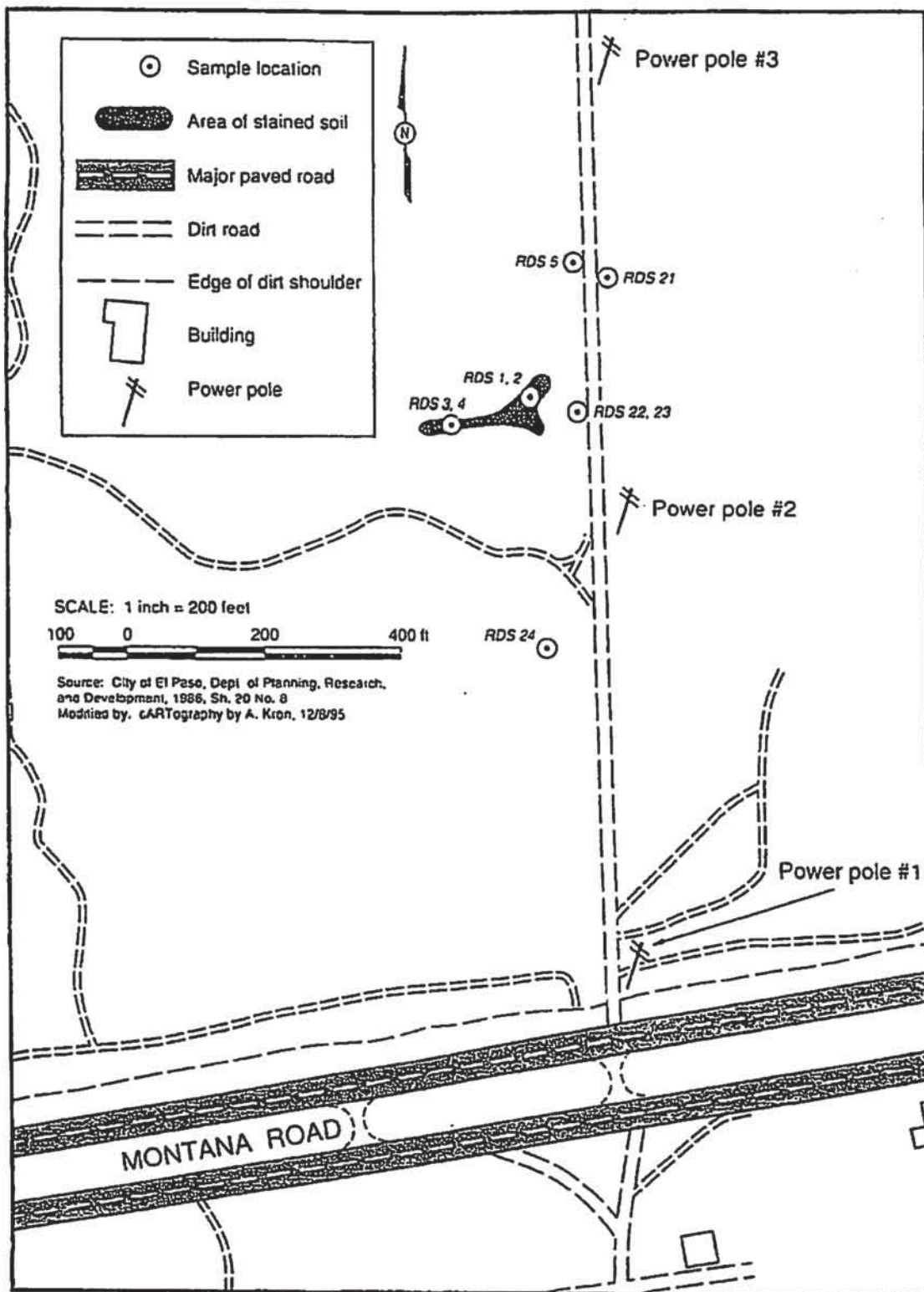


Figure 4. Estimated sampling locations between power poles #1 through #3 for the Rubble Dump Site, Fort Bliss, Texas.

GOLDER ASSOCIATES INC. FOR DBS JV/BOHANNAN-HUSTON, INC.

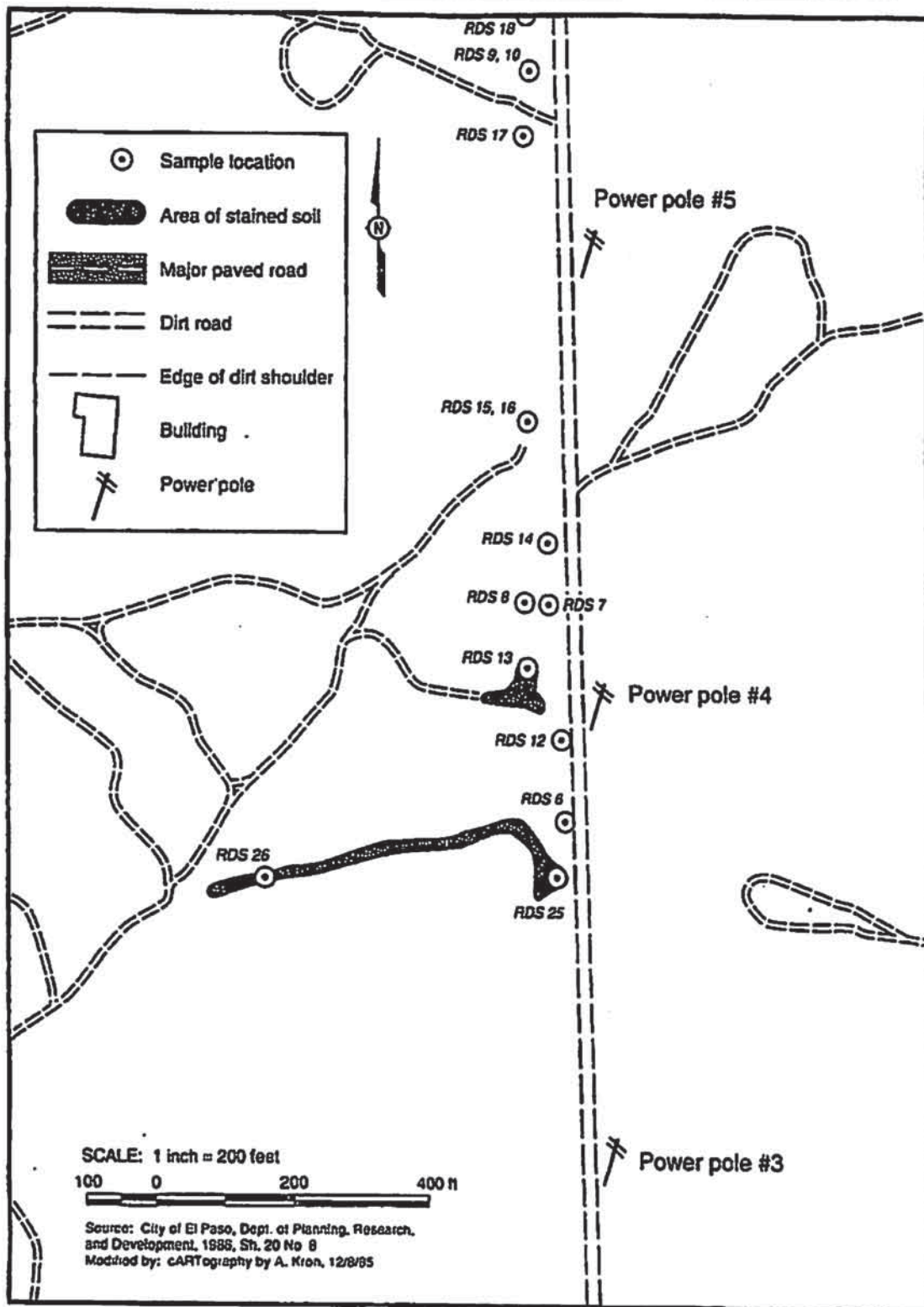


Figure 5. Estimated sampling locations between power poles #3 through #5 for the Rubble Dump Site, Fort Bliss, Texas.

GOLDER ASSOCIATES INC. FOR DBS JV/BOHANNAN-HUSTON, INC.



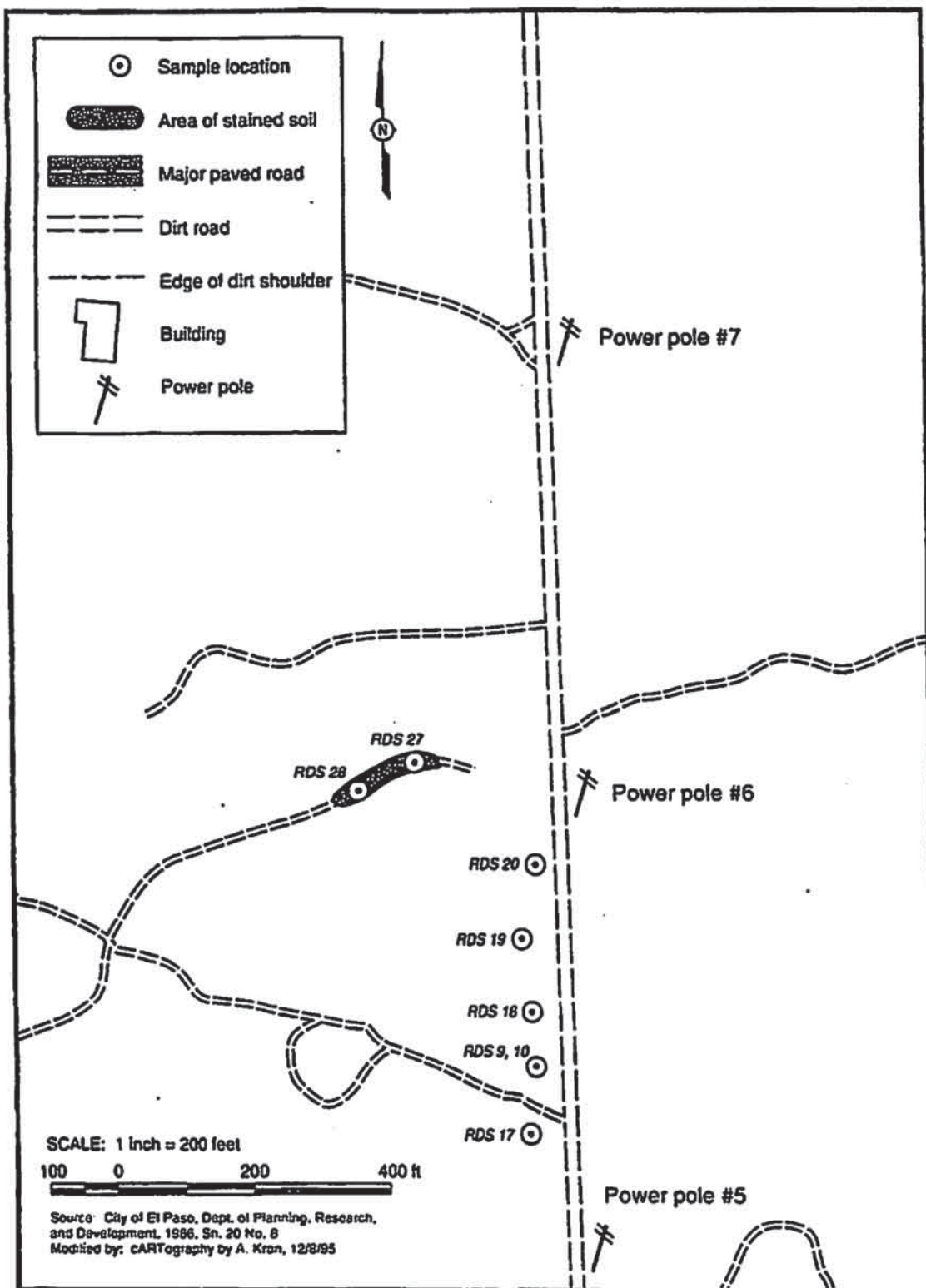


Figure 6. Estimated sampling locations between power poles #5 through #7 for the Rubble Dump Site, Fort Bliss, Texas.

GOLDER ASSOCIATES INC. FOR DBS JV/BOHANNAN-HUSTON, INC.

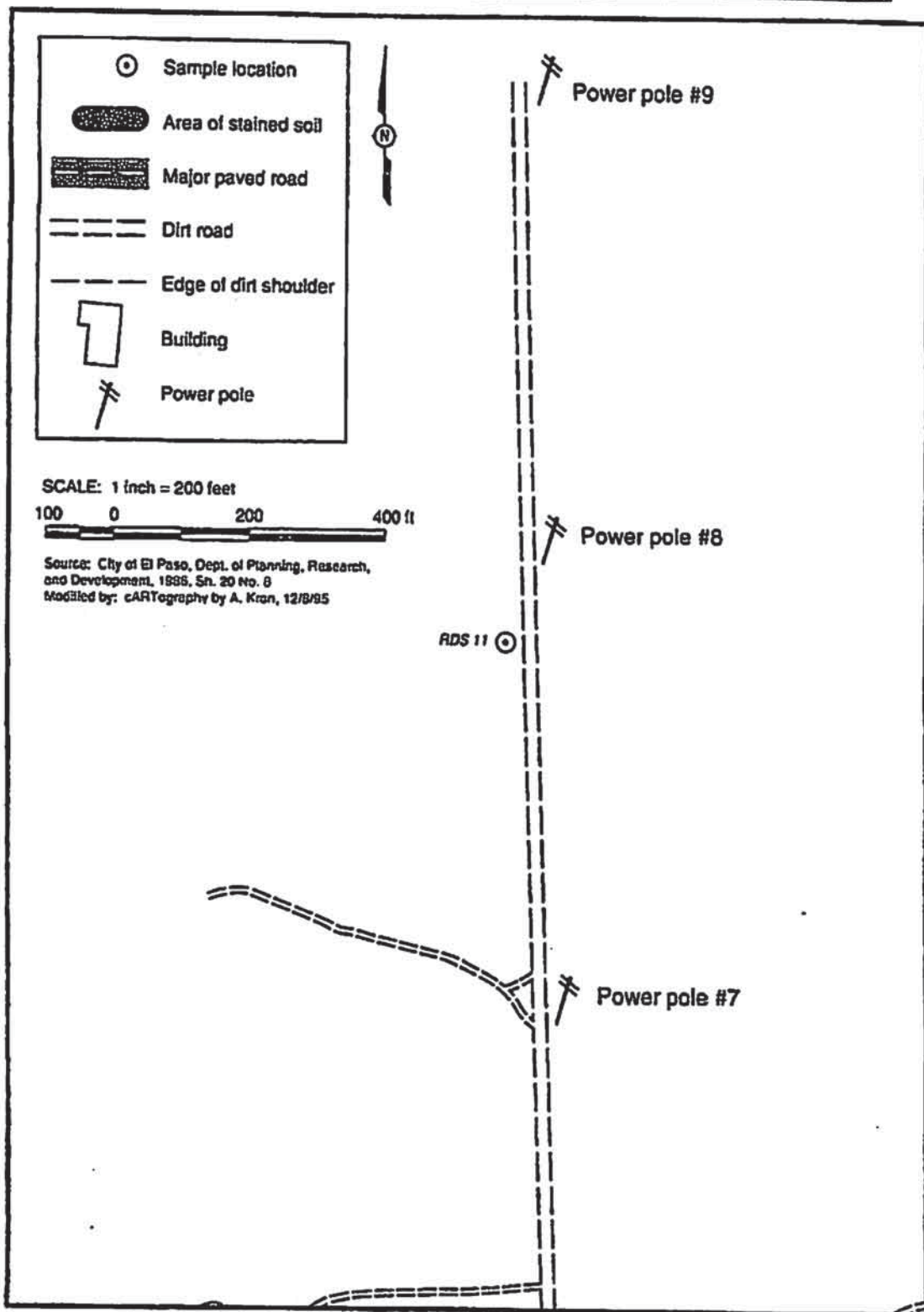


Figure 7. Estimated sampling locations between power poles #7 through #9 for the Rubble Dump Site, Fort Bliss, Texas.

GOLDER ASSOCIATES INC. FOR DBS JV/BOHANNAN-HUSTON, INC.

TABLE 7  
RUBBLE DUMP SITE  
ANALYTICAL RESULTS

Sample ID	Date Sampled	Sample Description	Volatile Organic Compounds EPA SW 846 Method 8260		Semi-Volatile Organic Compounds EPA SW 846 Method 8270		Oil and Grease Total Petroleum Hydrocarbons		Constituent	Substrate
			Concentration	Unit	Concentration	Unit	Concentration	Unit		
RDS-1	11/4/95	black stained sand	Unknown TIC	TLICs	1 Unknown acid methyl ester Cyclopentadiene, decamethyl 8 Unknown organic acid TICs 10 Unknown TICs	200LJ 1100LJ/N 150LJ to 990LJ 150LJ to 200LJ	TPH	3100 2420	Not Analyzed	
RDS-2	11/4/95	orange sand	Not Detected		TICs: Cyclopentadiene, decamethyl 1 Unknown organic acid TIC 5 Unknown hydrocarbon TICs 5 Unknown TICs	170LJ/N 190LJ 200LJ to 640LJ 210LJ to 270LJ	Oil and grease TPH	40.2 29.1	Not Analyzed	
RDS-3	11/4/95	black stained sand	Cyclopentadiene, octamethyl 1 Unknown TIC	TICs	Cyclopentadiene, decamethyl Cyclohexadiene, dodecamethyl 1 Unknown hydrocarbon TIC 6 Unknown TICs	180LJ/N 1300LJ/N 150LJ 150LJ to 270LJ	Oil and grease TPH	45.9 36.9	Not Analyzed	
RDS-4	11/4/95	orange sand	Cyclopentadiene, octamethyl 1 Unknown TIC	TICs	Cyclopentadiene, decamethyl Cyclohexadiene, dodecamethyl 7 Unknown hydrocarbon TICs 5 Unknown TICs	230LJ/N 140LJ/N 150LJ to 540LJ 270LJ to 1700LJ	Oil and grease TPH	27.6 31.6	Not Analyzed	
RDS-5	11/4/95	black stained sand and gravel	Not Detected		Diethylterephthalate TICs: Cyclopentadiene, decamethyl 8 Unknown hydrocarbon TICs 8 Unknown TICs	360 280LJ/N 140LJ to 400LJ 140LJ to 2500LJ	Oil and grease TPH	61.7 40.0	Not Analyzed	
RDS-6	11/4/95	black stained sand	1 Unknown TIC	TICs	Naphthalene Pentamethylene Fluoranthene Pyrene Benzofluoranthene Diethylterephthalate Chrysene Di-n-octyl phthalate Benzo[a]anthracene Benzo[a]pyrene TICs: Cyclopentadiene, decamethyl Cyclohexadiene, dodecamethyl Biphenyl Isomer of dimethylphthalate Isomer of CHSINS 1 Unknown hydrocarbon TIC 1 Unknown organic acid TIC 13 Unknown TICs	30LJ 150LJ 71LJ 410 70LJ 1500 130LJ 140LJ 120LJ 110LJ 470LJ/N 380LJ/N 250LJ/N 170LJ 210LJ 170LJ 280LJ 170LJ to 2800LJ	Oil and grease TPH	429.2 429.0	Not Analyzed	

GOLDER ASSOCIATES INC. FOR DBS JV/BOHANNAN-KUSTON, INC.





TABLE 7  
RUBBLE DUMP SITE  
ANALYTICAL RESULTS

Sample ID Number	Date Sampled	Sample Description	Volatiles Organic Compounds EPA SW 846 Method 8260	Semi-Volatiles Organic Compounds EPA SW 846 Method 8270	Oil and Grease Total Petroleum Hydrocarbons mg/kg (dry)	Asbestos Constituent (%)
RDS-11	11/4/05	gray to black stained sand	TIC: Cyclohexane, octameth	Asaphthene (1000LJ) Fluorene (1000LJ) Phenanthrene (1000LJ) Anthracene (1000LJ) TIC: 1,1'-1,2-propanediol-bis- thiourethane of CBH 5 Unknown hydrocarbon TICs 13 Unknown TICs	Oil and Grease TPH 2030	Not Analyzed
RDS-12	11/4/05	shingles	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-13	11/4/05	shingles	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-14	11/4/05	shingles	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-15	11/4/05	shingles	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-16	11/4/05	shingles	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-17	11/4/05	shingles	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-18	11/4/05	shingles	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-19	11/4/05	floor tiles	Not Analyzed	Not Analyzed	Not Analyzed	Chrysotile 25
RDS-20	11/4/05	shingles	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-21	11/4/05	floor tiles	Not Analyzed	Not Analyzed	Not Analyzed	Chrysotile 60
RDS-22	11/4/05	ceiling tile	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-23	11/4/05	unknown	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-24	11/4/05	unknown	Not Analyzed	Not Analyzed	Not Analyzed	Not Detected
RDS-25	11/10/05	black stained sand	Heptameth TIC: Cyclohexane, octameth	Not Analyzed	Oil and Grease TPH 2030	Not Analyzed
RDS-26	11/10/05	black stained sand	Heptameth TIC: Cyclohexane, octameth	Not Analyzed	Oil and Grease TPH 2030	Not Analyzed
RDS-27	11/10/05	black stained sand	Heptameth TIC: Cyclohexane, octameth	Not Analyzed	Oil and Grease TPH 2030	Not Analyzed
RDS-28	11/10/05	black stained sand	Heptameth TIC: Cyclohexane, octameth	Not Analyzed	Oil and Grease TPH 2030	Not Analyzed
RDS-29	11/10/05	tile blank	Heptameth TIC: Cyclohexane, octameth	Not Analyzed	Oil and Grease TPH 2030	Not Analyzed

Organic Outlets:

- (1) indicates an estimated value  
(2) indicates presumptive evidence of a compound. This flag is used only for TICs.  
(3) is used to identify compounds whose concentrations exceed the calibration range of the GC MS instrument for that specific analysis

GOLDER ASSOCIATES INC. FOR DBS JV/BOHANNAN-HUSTON, INC.



TABLE 8  
RUBBLE DUMP SITE  
COMPARISON WITH TNRCC AND EPA STANDARDS

Sample ID Number	Sample Description	Contaminant	SAI-Res <sup>4</sup> mg/kg	SAI-Ind <sup>5</sup> mg/kg	RSOIL <sup>£</sup> mg/kg	CSOIL <sup>¤</sup> mg/kg
RDS-10	black stained sand	benzo[a]anthracene	nr	nr	8.80E-01	7.80E+00
		benzo[b]fluoranthene	nr	nr	8.80E-01	7.80E+00
		benzo[a]pyrene	nr	nr	8.80E-02	7.80E-01
		indeno[1,2,3-cd]pyrene	nr	nr	8.80E-01	7.80E+00
		dibenz[a,h]anthracene	nr	nr	8.80E-02	7.80E-01

¤ - soil/air and ingestion standard for residential use (TNRCC)

£ - soil/air and ingestion standard for industrial use (TNRCC)

£ - residential soil (EPA)

¤ - commercial/industrial soil (EPA)

nr - not reported



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, U. S. ARMY GARRISON COMMAND  
2 SHERIDAN ROAD  
FORT BLISS, TEXAS 79818-6818

1 July 2002

Directorate of Environment

MEMORANDUM FOR:

(b) (6)

DSMOA Program Manager  
Corrective Action Section, Attn: MC-127  
Texas Natural Resource Conservation Commission  
P.O. Box 13087  
Austin, Texas 78711-3087

SUBJECT:

Transmittal of Publisher's Affidavit and Copy of Public Notice Ad

1. In accordance with TNRCC letter dated April 22, 2002, RE: Ft. Bliss, TNRCC Solid Waste Registration No. 63003, TNRCC Hazardous Waste Permit No. HW-50296, EPA ID No. TX 4213720101, Former Dry Cleaning Facility (Report), Solid Waste Management Unit No. 65, Review of Ft. Bliss response of October 19, 2001, to TNRCC letter dated September 19, 2001, and Ft. Bliss letter dated April 5 2002, addressing Post-Closure Care for the Former Dry Cleaner, Public Notice Required and the verbal agreement reached between Mr. Allan Posnick, TNRCC and David Dodge, Directorate of Environment, Ft. Bliss on 10 May 2002, in Austin Texas, Fort Bliss has caused a Public Notice ad to run in the El Paso Times Sunday newspaper.
2. That Public Notice ad informed the local population of the corrective measures which have been taken at four (4) solid waste management units located on Fort Bliss's property in Texas. Those units are as follows:
  - a. SWMU-016 Rubble Dump Site
  - b. SWMU-065 Former Dry Cleaning Facility
  - c. SWMU-070 Trans Mountain Buried Drum Site
  - d. SWMU-072 OB/OD Pit B-1
3. The publisher's Affidavit and Notice of Proposed Corrective Measures Ad are enclosed for your records.

Sincerely,

(b) (6)

Engineering & Environment, Inc.  
Installation Restoration Program Project Manager

Dd/dd

Cf: File: SWMU-016 Rubble Dump Site w/encl.  
SWMU-065 Former Dry Cleaning Facility w/encl.  
SWMU-070 Trans Mountain Buried Drum Site w/encl.  
SWMU-072 OB/OD Pit B-1 w/encl.



JUN-12-02 WED 12:28 PM

EL PASO TIMES CLASSIFIED

FAX NO. 915 546 6406

P. 01/01

(b) (6)

REM

915-588-2737

P. 2

PUBLISHER'S AFFIDAVIT

STATE OF TEXAS

COUNTY OF El Paso

Before me this day personally appeared (b) (6)

\_\_\_\_\_, the Assistant Manager

of the El Paso Times

newspaper which is regularly published or circulated in

El Paso County, Texas, who being by me duly sworn

deposes and says:

That the foregoing notice was published in said

newspaper on June 2nd, 2002.

(b) (6)

Subscribed and sworn to before me this the 12th day

of June, 2002.

(b) (6)



NOTARY PUBLIC  
STATE OF TEXAS  
My Comm. Exp. 04-27-2003

Notary in and for El Paso

El Paso County, Texas

ended this volume with 19:00 a.m. on

## Truck Driver Training Classes in

ended this volume with 19:00 a.m. on

NEW MEXICO STATE  
UNIVERSITY

Fecha: 07/08/98, und  
Lugar: Edm. 46,  
Calle: hombre,  
Powers Dr., El  
Toros, 79936, se  
registro con el departa-  
mento de policía de la

date of last publication of this notice and the claimant shall serve answer within twenty (20) days after the filing of the claim, as provided in Rule 20 of the U.S. Rules

1803 Mountain Ave  
Call 532-2550

R&P Personnel  
355-7478, 357-5777

WE SPECIALIZE IN





DEPARTMENT OF THE ARMY  
HEADQUARTERS, U. S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS  
1733 PLEASANTON ROAD  
FORT BLISS, TEXAS 79916-6816

REPLY TO  
ATTENTION OF:

ATZC-DOE (200)

9 April 2001

MEMORANDUM FOR:

(b) (6)

DSMOA Program Manager  
Corrective Action Section, Attn: MC-127  
Texas Natural Resource Conservation Commission  
P.O. Box 13087  
Austin, Texas 78711-3087

SUBJECT: Response Action Completion Report (RACR) for the Montana Road Rubble Dump Spill Site, SWMU 16, FTBL-028, EPA/TX HSWA Permit I.D. # 4213720101, issued July 1991

1. Attached for your review and approval is the Response Action Completion Report (RACR) for the Montana Road Rubble Dump Spill Site, SWMU 16, FTBL-028.
2. The discovery of asbestos roofing shingles and evidence that unknown local personnel had discarded used engine oil at the site during the initial EPA inspection and survey of Fort Bliss earned this site its designation as a SWMU. Subsequently investigation revealed that this area along side a power line easement was more properly an informal, unauthorized dumping ground for local civilian contractors and landscapers as well as citizens from the nearby residential areas across Montana Road from the reservation.
3. Previously, access was not controlled as this area of the Fort Bliss Military Reservation was not fenced and gated. As part of the response actions, Fort Bliss has constructed a fence along Montana Road to control access to the area and prevent future use of this area as a dumpsite. The enclosed RACR summarizes the cleanup activities and results of sampling that were performed at the property. Results presented in the report demonstrate that the conditions at the property meet the Remedy Standard A requirements under the Texas Risk Reduction Program (30 TAC, Chapter 350).
4. Based on the completed response actions, Fort Bliss is requesting a "no further action" letter for this site. Please direct any questions to me by calling 915-568-7979 or email (b) (6) @bliss.army.mil).

Sincerely,

(b) (6)

Engineering and Environment, Inc.  
IRP Project Manager

Cf. FTBL-070 File  
DOE Distribution A



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
**HEADQUARTERS, U. S. ARMY GARRISON COMMAND**  
**2 SHERIDAN ROAD**  
**FORT BLISS, TEXAS 79916-6816**

ATZC-DOE (200)

1 November 2002

MEMORANDUM FOR:

(b) (6)

TCEQ (MC-127)  
Corrective Action Section  
12100 Park 35 Circle, Building D  
Austin, Texas 78753

**SUBJECT:** Request for Additional Information, RACR, Rubble Dump Site, SWMU 16, FTBL-028

1. Reference, your email message, subject as above, dated October 28, 2002 (attached).
2. You requested additional information on Section 3.5.2, Verification Sample Results, page 3-5, specifically results of the Synthetic Precipitation Leaching Procedures with results below the PQL. Those results are included in Table 2, under sample RDS-10V in parentheses..
3. Additionally we are inclosing the laboratory data sheet for the SPLP results, which should be added behind the data validation, write up in Appendix F.
4. Thank you for your assistance. You may reach me at 915-568-7979, or (b) (6) @bliss.army.mil if you have any further questions.

Sincerely,

(b) (6)

DERA Program Manager  
Directorate of Environment

DD/dd

Incl: Copy of 10-28-02 email  
SPLP Laboratory Data sheet.

Cf. File, FTBL-028, SWMU 16 Rubble Dump Site



**Dodge, David (Contractor)**

---

**From:** (b) (6) [REDACTED]@tceq.state.tx.us]  
**Sent:** Monday, October 28, 2002 12:23 PM  
**To:** (b) (6) [REDACTED]@ernh10.bliss.army.mil  
**Subject:** RACR for Rubble Dump Site

(b) (6) I would like to approve the RACR for the Rubble Dump Site but it appears to be lacking one piece of info I would need to approve it. In section 3.5.2 Verification Sample Result, page 3-5 it says that samples with highest concentrations of metals were further tested by the Synthetic Precipitation Leaching Procedures with results below the PQL. I don't believe those results were included in the report. Since some of the totals for lead and cadmium exceeded the soil to gw PCL the SPLP results should have been included. Once I get that info I can send out my letter. Please let me know if you have any questions about this. Thanks, (b) (6) [REDACTED]

SEVERN TRENT LABORATORIES  
ANALYTICAL REPORT

JOB NUMBER 201609

Prepared For  
Roy E. Nelson, Inc.  
5599 San Felipe  
Suite 200  
Houston, TX 77056-2721

Project: Ft. Bliss, Montana Road Site  
Attention: Greg Brady

Date: 02/22/2001

(b) (6)

Title: Project Manager

E-Mail: (b) (6) @stl-inc.com

2/2/01

Date

STL Chicago  
2417 Bond Street  
University Park, IL 60466

PHONE: (708) 534-5200  
FAX...: (708) 534-5211

STL Chicago is part of Severn Trent Laboratories, Inc.



STL Chicago  
2417 Bond Street  
University Park, IL 60466  
Phone: 708-534-5200  
Fax: 708-534-5211

Report To:

Contact: Chris E. Smith  
Company: Enviro-Tek, Inc.  
Address: 5549 S. Cicero Ave. Ste. 200  
Chicago, IL 60638  
Phone: 773-985-6712  
Fax: 773-985-6703  
E-Mail: chris@envirotek.com

Bill To:

Contact: Enviro-Tek  
Company: Enviro-Tek, Inc.  
Address: 5549 S. Cicero Ave. Ste. 200  
Chicago, IL 60638  
Phone: 773-985-6712  
Fax: 773-985-6703  
POB: Quincy

Shaded Areas For Information Only

Lab Lot# 200970  
Package Sealed Yes (No) No  
Recalled on Ice Yes (No) No  
Temperature °C of Cooler 2.3

Sampler Name: (b) (6)  
Project Name: El Rios / Mountain River  
Project Location: El Paso TX  
Lab Pile: 1  
Signature: [Signature]  
Project Number: 12371  
Date Required: 03-03-2010  
Hard Copy: 3  
Fun: 1

Laboratory ID	Client Sample ID	Sampling Date	Sampling Time	Refrigeration		Comp/Grab	H/Cont.	Vol	Preserv	Temp	pH	Check OK	Res Cl <sub>2</sub> Check	Sample Labels and COC Agree	COC not present	Additional Analysis / Remarks
				Within Hold Time	Properly Indicated											
1	RDS-11V	11/16/00	1525	Yes	Yes	5 G	8oz	8oz	4°C	4°C	7.0	Yes	Yes	Yes	Yes	
2	RDS-10V	11/16/00	1550	Yes	Yes	5 G	8oz	8oz	4°C	4°C	7.0	Yes	Yes	Yes	Yes	
3	RDS-6V	11/16/00	1605	Yes	Yes	5 G	8oz	8oz	4°C	4°C	7.0	Yes	Yes	Yes	Yes	
4	RDS-1V	11/16/00	1615	Yes	Yes	5 G	8oz	8oz	4°C	4°C	7.0	Yes	Yes	Yes	Yes	
5	RDS-100	11/16/00	1630	Yes	Yes	5 G	8oz	8oz	4°C	4°C	7.0	Yes	Yes	Yes	Yes	

RELINQUISHED BY Chris E. Smith COMPANY Enviro-Tek, Inc. DATE 11/16/00 TIME 1515  
RELINQUISHED BY [Signature] COMPANY Enviro-Tek, Inc. DATE 11/16/01 TIME 1630

Date Received 11/17/00 TIME 0951  
Counter: FX Hand Delivered: Yes  
EIM of Loading see attach

Container Key  
1. Plastic  
2. VOA Vial  
3. Sterile Plastic  
4. Amber Glass  
5. Wide-mouth Glass  
6. Other

Preservative Key  
1. HCl, Cool to 4°  
2. H2SO4, Cool to 4°  
3. HNO3, Cool to 4°  
4. NaOH, Cool to 4°  
5. NaOH/2a, Cool to 4°  
6. Cool to 4°  
7. None

Media Key  
SW - Wastewater  
W - Water  
SS - Sediment  
DS - Drum Solid  
DL - Drum Liquid  
L - Leachate  
WV - Waste  
O - Other



1

**INORGANIC ANALYSES DATA SHEET**

EPA SAMPLE NO.

**RDS10V**

ab Name: STL\_CHICAGO Contract:

ab Code: STL\_\_\_\_\_ Case No.: \_\_\_\_\_ SAS No.: \_\_\_\_\_ SDG No.: 201609

atrix (soil/water): WATER

Lab Sample ID: 201609-001

level (low/med): LOW

Date Received: 01/15/01

Solids: 0.0

Concentration Units (ug/L or mg/kg dry weight): UG/L

[illegible]

Color Before: \_\_\_\_\_ Clarity Before: \_\_\_\_\_ Texture: \_\_\_\_\_

Color After: \_\_\_\_\_ Clarity After: \_\_\_\_\_ Artifacts: \_\_\_\_\_

ments:

FORM I - IN

ILM03.0

15



DEPARTMENT OF THE ARMY  
HEADQUARTERS, U. S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS  
1733 PLEASANTON ROAD  
FORT BLISS, TEXAS 79916-6816

REPLY TO  
ATTENTION OF:

ATZC-DOE (200)

9 April 2001

MEMORANDUM FOR:

(b) (6)

DSMOA Program Manager  
Corrective Action Section, Attn: MC-127  
Texas Natural Resource Conservation Commission  
P.O. Box 13087  
Austin, Texas 78711-3087

SUBJECT: Response Action Completion Report (RACR) for the Montana Road Rubble Dump Spill Site, SWMU 16, FTBL-028, EPA/TX HSWA Permit I.D. # 4213720101, issued July 1991

1. Attached for your review and approval is the Response Action Completion Report (RACR) for the Montana Road Rubble Dump Spill Site, SWMU 16, FTBL-028.
2. The discovery of asbestos roofing shingles and evidence that unknown local personnel had discarded used engine oil at the site during the initial EPA inspection and survey of Fort Bliss earned this site its designation as a SWMU. Subsequently investigation revealed that this area along side a power line easement was more properly an informal, unauthorized dumping ground for local civilian contractors and landscapers as well as citizens from the nearby residential areas across Montana Road from the reservation.
3. Previously, access was not controlled as this area of the Fort Bliss Military Reservation was not fenced and gated. As part of the response actions, Fort Bliss has constructed a fence along Montana Road to control access to the area and prevent future use of this area as a dumpsite. The enclosed RACR summarizes the cleanup activities and results of sampling that were performed at the property. Results presented in the report demonstrate that the conditions at the property meet the Remedy Standard A requirements under the Texas Risk Reduction Program (30 TAC, Chapter 350).
4. Based on the completed response actions, Fort Bliss is requesting a "no further action" letter for this site. Please direct any questions to me by calling 915-568-7979 or email (b) (6) @bliss.army.mil).

Sincerely,

(b) (6)

Engineering and Environment, Inc.  
IRP Project Manager

CE FTBL-070 File  
DOE Distribution A

**Appendix B: Phase 1 Environmental Due Diligence Audit for FAA Radio Receiver Sites**



**ELP Radio Receiver Sites**  
**George Dieter Drive and Montana Avenue**  
**El Paso, Texas 79916**

**Phase I Environmental Due Diligence Audit**



**Prepared For:**

**U.S. Department of Transportation**  
**Federal Aviation Administration**  
**800 Independence Avenue, SW**  
**Washington, DC 20591**

**Prepared By:**

**Lockheed Martin (NISC III)**  
**400 Virginia Ave, SW**  
**Suite 400**  
**Washington, DC 20024**  
**(202) 646-5681**

Site Reconnaissance Date: November 8, 2012  
Draft Report Submittal Date: November 30, 2012  
Revised Report Submittal Date: January 29, 2013

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<b>Appendix G</b>	RTR Site Environmental Report: 22 Transformers, RCB, Lead, Asbestos Inspection
<b>Appendix H</b>	Waste Manifests



## LIST OF ACRONYMS AND ABBREVIATIONS

ACM	Asbestos-Containing Materials
AST	Aboveground Storage Tank
ASTM	ASTM International (formerly the American Society for Testing and Materials)
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESQG	Conditionally Exempt Small Quantity Generator
CORRACTS	RCRA Corrective Action Sites
CSA	Central Service Area
ECHO	Enforcement and Compliance History Online
EDDA	Environmental Due Diligence Audit
EDR	Environmental Data Resources, Inc.
ELP	El Paso International Airport (i.e., site identifier)
ENCON	ENCON International, Inc.
EPA	U.S. Environmental Protection Agency
ERNS	Emergency Response Notification System
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FINDS	Facility Index Systems
FIRM	Flood Insurance Rate Map
FSEP	Facility Service Equipment Profile
FUDS	Formerly Used Defense Sites
HMIRS	Hazardous Materials Incident Report System
LTANK	Leaking Tanks
LUST	Leaking Underground Storage Tank
MLTS	Material Licensing Tracking System
NFRAP	No Further Remedial Action Planned
NHPA	National Historic Preservation Act
NISC III	National Airspace System Implementation Support Contract
NPL	National Priorities List
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
PCB	Polychlorinated Biphenyls
pCi/L	picoCuries/Liter
RCRA	Resource Conservation and Recovery Act
RCRAInfo	RCRA Information System
RECO	Real Estate Contracting Officer
RTR	Remote Transmitter/Receiver
SHWS	State Hazardous Waste Site
SSC	System Support Center
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
TSD	Treatment, Storage, and Disposal
USC	United States Code
USGS	U.S. Geological Survey
UST	Underground Storage Tank

## 1.0 SUMMARY

Lockheed Martin (NISC III), in support of the Federal Aviation Administration (FAA), presents this Phase I Environmental Due Diligence Audit (EDDA) report for a former remote transmitter/receiver (RTR) located east of George Dieter Drive and north of Montana Avenue, El Paso, Texas 79916. The former RTR is located approximately two miles east of El Paso International Airport (ELP). The former RTR consists of two separate tracts of land leased by the FAA from the Department of the Army (i.e., the Lessor). The main portions of the two tracts of land are separated by 900 feet; however, the tracts of land have a contiguous access road. The two tracts of land are hereafter referred to as the “Subject Properties” for the purposes of this report. The larger, northern tract of land is referred to as the “North Parcel - Former ELP RTR” for the purposes of this report. The smaller, southern tract of land is referred to as the “South Parcel - ELP Remote Radio Receiver” for the purposes of this report. Please note that Subject Properties should not be confused with the currently commissioned, full service location with a Facility Service Equipment Profile (FSEP) identifier of “ELP RTR” which is located on airport property.

Records were obtained from various agencies to gather historical information and documentation pertaining to potential environmental liabilities associated with the subject and surrounding properties. A database search of federal and state environmental records was performed to determine if neighboring or adjacent properties have the potential to adversely affect the Subject Properties.

The Subject Properties were likely built and operated by the FAA since the 1950s and decommissioned in 1972. The Subject Properties are currently decommissioned, unused and idle. The Real Estate Contracting Officer (RECO) in the Central Service Area (CSA) was contacted by Lockheed Martin (NISC III). The RECO explained that the leases of the Subject Properties will be revoked due to the planned sale of the property by the Department of the Army for the intent of development of military housing.

The Subject Properties are vacant and cleared of all structures except for some miscellaneous debris.

This report serves as documentation of a Phase I EDDA for the Subject Properties. The purpose of this audit is to exercise due diligence by evaluating potential environmental liabilities associated with the Subject Properties. This audit was performed in accordance with ASTM Standard E 1527-05 and FAA Order 1050.19B. A detailed list of findings associated with the Subject Properties is provided in Section 8.0 of this report. This Phase I EDDA has revealed no recognized environmental conditions (as defined by ASTM Standard E 1527-05) in connection with the Subject Properties.

## 2.0 INTRODUCTION

### 2.1 Purpose

The leases for the Subject Properties will be revoked by the Department of the Army (please see Appendix A for the lease documents and correspondence including the letter dated April 28, 2011 revoking the permits). The FAA intends to return the property to



the Lessor. Due to the anticipated lease termination, the FAA Facility Disposition program requested a Phase I EDDA to be performed for the Subject Properties. The purpose of this Phase I EDDA is to identify, to the extent feasible and subject to the limitations discussed in this report, recognized environmental conditions and historical recognized environmental conditions related to the Subject Properties. According to ASTM E 1527-05, the term “recognized environmental conditions” is defined as follows:

*the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions.*

This report serves as documentation of a Phase I EDDA for the Subject Properties. The purpose of this audit is to assist the FAA in exercising due diligence by evaluating potential environmental liabilities associated with the Subject Properties. This audit was performed in accordance within the guidelines set forth in FAA Order 1050.19B, Environmental Due Diligence Audits in the Conduct of FAA Real Property Transactions and ASTM E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

This report is a revision and update of the Phase I EDDA Report submitted on January 9, 2012 and revised on February 29, 2012. The original site reconnaissance was conducted on October 20, 2011. Due to the passing of more than 180 days since the original site reconnaissance and the demolition and removal of the site structures and concrete foundations in September 2012, a second site reconnaissance was conducted on November 8, 2012.

## 2.2 Detailed Scope of Services

A detailed site reconnaissance was conducted on November 8, 2012, and consisted of a visual survey of all facility buildings, property grounds, and immediate surrounding areas to identify recognized environmental conditions. The purpose of the site reconnaissance was to identify areas such as manufacturing and process areas; chemical storage areas; waste storage areas; suspected disposal areas; subsurface structures such as drains, sumps, septic systems, and tanks; fuel storage areas; electrical equipment which may contain polychlorinated biphenyls (PCB); evidence of historical uses; and evidence of spills or potential releases of hazardous substances such as stressed vegetation and soil staining. Records were obtained from various agencies to gather historical information and documentation pertaining to potential environmental liabilities associated with the Subject Properties and surrounding properties. A database search of federal and state environmental records was performed to determine if neighboring or adjacent properties have the potential to adversely affect the Subject Properties.



### **2.3 Significant Assumptions**

Surface and groundwater flow directions have been estimated on the basis of surface topography and nearby bodies of water. Groundwater flow direction may be impacted by hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata. Based on the 1994 U.S. Geological Survey (USGS) topographic map, groundwater flow at the Subject Properties is presumed to be towards the west southwest towards the Rio Grande River.

### **2.4 Limitations and Exceptions**

This EDDA was performed in accordance with the ASTM Standard E 1527-05 and FAA Order 1050.19B. The methodologies contained in these standards and orders include, among other things, interviews with individuals familiar with the Subject Properties, site reconnaissance, and historical records review. Information obtained during the interviews and site reconnaissance was recorded and reviewed before it was included in this EDDA report. All information that was obtained during the site investigation and subsequently included within the EDDA is assumed to be reliable. Not all such information, however, is susceptible to independent verification. Data from additional government databases was obtained and reviewed using accepted industry standards and practices. The conclusions summarized herein are based on the limited observations and review described within this submittal at the time the Phase I EDDA was conducted. Future events at the site or the surrounding properties may alter these findings.

Performing an EDDA in accordance with ASTM Standard E 1527-05 and FAA Order 1050.19B is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and both practices recognize reasonable limits of time and cost.

### **2.5 Special Terms and Conditions**

The Environmental Professional is not aware of any special terms or conditions.

### **2.6 User Reliance**

The Environmental Professional is not aware of any user reliance issues.

## **3.0 SITE DESCRIPTION**

The Subject Properties are located east of George Dieter Drive and north of Montana Avenue, El Paso, Texas 79916. The Subject Properties do not have a street address; however, the adjacent property has a street address of 11301 Montana Avenue. The topography of the area is flat and surrounded by desert. A site map of the area is provided in Section 16.1. Site aerial photographs of the Subject Properties and immediate adjoining properties are provided in Appendix B.

### 3.1 Location and Legal Description

The Subject Properties are located approximately two miles east of ELP and consist of two separate tracts of land leased by the FAA from the Department of the Army. The main portions of the two tracts of land are separated by 900 feet; however, the tracts of land have a contiguous access road (see Section 16.1).

The Legal Description of the larger, northern tract of land (i.e., the “North Parcel - Former ELP RTR”) is available in Exhibit “A”, Legal Description, to lease FAA No. DTFASW-07-L-00164. The facility portion of leasehold No. DTFASW-07-L-00164 is 200 feet by 230 feet with a north/south access road of 30 feet by 1150 feet and an east/west access road portion of 50 feet by 85 feet (total of 1.945 acres). Please note that the northern tract of land is referred to as “radar approach control facilities” in FAA No. DTFASW-07-L-00164. A building was located within the leasehold at the following approximate location:

	Decimal	Degrees
Latitude (North):	31.8041	31° 48' 26.4"
Longitude (West):	-106.2996	106° 17' 58.5"
Elevation:	4005 ft. above sea level	

The Legal Description of the smaller, southern tract of land (i.e., the “South Parcel - ELP Remote Radio Receiver”) is available in Exhibit “A”, Property Description, to lease FAA No. DTFASW-07-L-00006. The facility portion of leasehold No. DTFASW-07-L-00006 is 200 feet by 200 feet with a north/south access road of 30 feet by approximately 525 feet (total of 1.28 acres, more or less). A concrete pad was located within the leasehold at the following approximate location:

	Decimal	Degrees
Latitude (North):	31.8073	31° 48' 14.9"
Longitude (West):	-106.2996	106° 17' 58.5"
Elevation:	4005 ft. above sea level	

Both tracts of land are located in Section 31, Township 2, Block 79, T&P Survey, El Paso County, Texas. The lease agreements are provided in Appendix A.

### 3.2 Site and Vicinity General Characteristics

The Subject Properties are located in a flat basin within Maneuver Area No. 1 of Fort Bliss, Texas. The adjacent property is undeveloped. The developed community of East El Paso is located south of Montana Avenue. Please see Section 3.5 for additional information.

### 3.3 Current Use of the Property

The Subject Properties are no longer being used by the FAA as an RTR. The FAA removed all equipment and decommissioned the facilities in approximately 1972. The Lessor has stated that the building and concrete foundations could remain in place (see



Appendix A). Nevertheless, as of 2013 the FAA has removed all buildings and concrete slabs on the Subject Properties. Thus, the Subject Properties are vacant and idle.

### 3.4 Description of Structures, Roads, Other Improvements on the Site

A *Site Environmental Report* dated August 16, 2011 (see Appendix G), provides the following description of the site based on an inspection on July 25, 2011.

One building (~ 900 square feet in size), a small outbuilding, and 21 transformers, along with some other miscellaneous equipment were on the main site at the time of the inspection. The building was not in use at the time of the inspection. The transformers and other equipment had been stored by the FAA at this location over the years. The property, approximately two hundred by two hundred feet in size, was being leased from the U.S. Army. At the time this Limited Asbestos Survey was performed, the date of construction of the building was not known. A secondary site nearly adjacent to the main site included a transformer (# 22) and a concrete slab with floor tile around it (in the dirt).

As of the site reconnaissance performed by Lockheed Martin (NISC III) on October 20, 2011, the 22 transformers had been removed. The building, small outbuilding, and abandoned concrete pads were present. The building contained two rooms but was completely vacant. The tracts of land were surrounded by wood post and barbed wire fences that were in disrepair.

As of the site reconnaissance performed by Lockheed Martin (NISC III) on November 8, 2012, the building, small outbuilding, abandoned concrete pads, wood post and barbed wire fences, and associated fence gates had been removed from both tracts of land.

According to FAA No. DTFASW-07-L-00006 and FAA No. DTFASW-07-L-00164, the leases include an access road that begins at the north right-of-way boundary of US Highway No. 62 (i.e., Montana Avenue). However, the access road is impassable south of the South Parcel - ELP Remote Radio Receiver tract. The Subject Properties are accessible via a dirt access road that connects with George Dieter Drive. Please see Appendix E for site reconnaissance photographs.

### 3.5 Future Use of the Property

According to correspondence dated April 26, 2011, the Department of the Army intends to sell 1,800 acres of land in exchange for housing to be built on Fort Bliss. The Subject Properties are located within the parcel to be sold. Please see Appendix A for the correspondence and associated map.

### 3.6 Current Uses of the Adjoining Properties

A review of topographic maps, aerial photographs, a walk-through of the site, and interviews revealed that the majority of the areas immediately surrounding the Subject Properties consist of undeveloped desert. The following boxed text describes the areas located north, east, south, and west of the Subject Properties.



<b>Neighboring Properties</b>	
<b>North</b>	Undeveloped desert with a Fort Bliss Training Complex Range Division property farther north
<b>East</b>	Undeveloped desert and a Texas Air National Guard property farther east
<b>South</b>	Undeveloped desert and Montana Avenue
<b>West</b>	Undeveloped desert and George Dieter Drive

## **4.0 USER PROVIDED INFORMATION**

The following sections describe the historical and present ownership of the site and its previous uses.

### **4.1 Title Records**

Title records were not obtained as part of this EDDA process because other sources of information, including interviews and historical aerial photographs did not indicate any potential sources of contamination from previous uses. The Subject Properties are leased from the Department of the Army.

### **4.2 Environmental Liens or Activity and Use Limitations**

There are no known environmental liens or activity and use limitations associated with the Subject Properties.

### **4.3 Specialized Knowledge**

No specialized knowledge or experience that is material to recognized environmental conditions in connection with the Subject Properties was communicated by the FAA as part of this EDDA.

### **4.4 Commonly Known or Reasonably Ascertainable Information**

Records were obtained from various agencies to gather historical information and documentation pertaining to potential environmental liabilities associated with the subject and surrounding properties. A database search of federal and state environmental records was performed to determine if neighboring or adjacent properties have the potential to adversely affect the Subject Properties. Interviews were conducted with FAA employees who are familiar with the site and adjacent property.

### **4.5 Valuation Reduction for Environmental Issues**

It is unknown whether the Subject Properties values have been reduced due to environmental issues on-site or on adjacent properties.

#### 4.6 Owner, Property Manager, and Occupant Information

Based on information obtained from FAA Real Estate and FAA employees, the Subject Properties were developed and commissioned in the 1950s, and used by the FAA as an RTR until approximately 1972 and thereafter as storage. The Subject Properties are leased by the FAA and no longer used by the FAA. The Lessor is the Department of the Army.

#### 4.7 Reason for Performing Phase I

The FAA requested a Phase I EDDA based on the expectation to terminate the leases of the Subject Properties.

### 5.0 RECORDS REVIEW

Records were reviewed from various federal, state, and local agencies to obtain information on potential environmental concerns that could impact the Subject Properties. Lockheed Martin (NISC III) may have also obtained photographs and maps from these local agencies. A discussion of the federal, state, and local records review is provided in the following sections. Refer to Appendix F for the Environmental Data Resources, Inc. (EDR), Report.

#### 5.1 Standard Environmental Record Sources

##### Federal and State Records

Based upon the records review and personal interviews, no environmental concerns were identified with respect to the Subject Properties. The findings from the information reviewed for this EDDA includes the following:

- No documented spills or hazardous materials response incidents at the Subject Properties
- No hazardous waste generators on the Subject Properties.

The databases listed below were among those searched by EDR for this EDDA. Detailed information contained in these databases and a complete list of all databases searched is included in the EDR Report in Appendix F.

Database Search	Results
AST - Aboveground Storage Tanks	None
CERCLIS - Comprehensive Environmental Response, Compensation, and Liability Information System	None
CORRACTS - RCRA Corrective Action Sites	None
ERNS - Emergency Response Notification System	None
FINDS - Facility Index Systems	None
FUDS - Formerly Used Defense Sites	None
HMIRS - Hazardous Materials Incident Report System	None
LTANK - Leaking Tanks	None
LUST - Leaking Underground Fuel Storage Tanks	None
Mining, Oil and Gas Operations	None



## EDDA Phase I Report – ELP Radio Receiver Sites

Database Search	Results
MLTS - Material Licensing Tracking System	None
NFRAP - No Further Remedial Action Planned	None
NPL - National Priorities List	None
RCRA - Resource Conservation and Recovery Act	None
SHWS - State Hazardous Waste Sites	None
Solid Waste Landfills, Incinerators, and Transfer Stations	None
Spills	None
TRIS - Toxic Chemical Release Inventory System	None
TSCA - Toxic Substances Control Act	None
TSD - Treatment, Storage, and Disposal	None
UST - Underground Storage Tank	One site, Valero Corner Store 1270, with three (3) 12,000-gallon gasoline USTs, located within 1/8-mile south of the Subject Properties; no compliance violations noted.

In addition, Fort Bliss is a Department of Defense site. The Subject Properties are located within Maneuver Area No. 1 of Fort Bliss, Texas.

None of the orphan sites listed in the EDR Report is anticipated to be within one mile of the Subject Properties.

The *EDR Radius Map Report with GeoCheck*, Inquiry Number 3187874.2s, is dated October 17, 2011. EDR provides online monitoring and as of November 2012, there have been no changes in the database searches listed above. Furthermore, Booz Allen (NISC III) searched EPA's Enforcement and Compliance History Online (ECHO) database to confirm that there are no documented environmental concerns in the vicinity of the Subject Property. Two ECHO database records within one mile of the Subject Properties are listed in the RCRA Information System (RCRAInfo). One site, Southwest Gold Plating, is a conditionally exempt small quantity generator (CESQG) with no history of non-compliance or enforcement actions. The second site, Hydrocarbon Recyclers Inc. of San Antonio, is a hazardous waste transporter with no history of non-compliance or enforcement actions.

### Local Records

A Parsons TSSC-III *Site Survey Report* from May 16, 2012, documents the conditions at the North Parcel - Former ELP RTR and outlines the scope of work for removal and disposal of environmental constituents and demolition, removal and disposal of site structures. Section 12.0 provides more information based on the May 16, 2012 *Site Survey Report* and the *RTR Site Environmental Report: 22 Transformers, PCB, Lead, Asbestos Inspection*, August 16, 2011, prepared by ENCON International, Inc. (ENCON). Waste manifests from disposal activities conducted in 2011 and 2012 are provided in Appendix H.



## 5.2 Additional Environmental Record Sources

Lockheed Martin (NISC III) reviewed pertinent local files and conducted interviews with FAA personnel. Interviews with the FAA Real Estate point of contact were also conducted by NISC III staff. Other information was compiled using Internet sources as described in this section.

### National Wetlands Inventory and Flood Insurance Rate Maps

A wetlands map was obtained from the National Wetlands Inventory (NWI) website (<http://wetlands.fws.gov/>). Refer to Appendix D for the NWI map. A review of the NWI Map indicates that no wetlands are located within one mile of the Subject Properties.

The Flood Insurance Rate Maps (FIRM) was obtained from the Federal Emergency Management Agency (FEMA) website, <http://www.fema.gov/hazard/map/flood.shtm>. According to the map, the site lies within Zone X, which are areas determined to be of minimal flooding.

A review of information provided in the Natural Resource Conservation Web Soil Survey website, <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>, indicate the soils for the Subject Properties consist primarily of loamy fine sand, Pendero-Copia-Nations complex. Section 5.4 of this report provides a detailed discussion on the soils of the Subject Properties.

## 5.3 Physical Setting Source(s)

The property immediately surrounding the Subject Properties consists primarily of undeveloped desert.

## 5.4 Historical Use Information on the Property

### Topographic Map Review

As a part of the investigation of the Subject Properties, the USGS topographic maps for 1908, 1945, 1955, 1967, 1973, and 1994 were obtained from EDR. Copies of the topographic maps are provided in Appendix C.

Topographic Map Year	Topographic Map Direction and Description	
	Direction	Description
1908	Subject Properties	Undeveloped desert
	North	Undeveloped desert
	East	Undeveloped desert
	South	Undeveloped desert
	West	Undeveloped desert

EDDA Phase I Report – ELP Radio Receiver Sites

Topographic Map Year	Topographic Map Direction and Description	
	Direction	Description
1945	Subject Properties	Undeveloped desert
	North	Undeveloped desert with “Sherman Hog Ranch” farther north
	East	Undeveloped desert
	South	Undeveloped desert with “Carlsbad Highway” farther south
	West	Undeveloped desert with an unpaved road
1955	Subject Properties	Tract of the South Parcel - ELP Remote Radio Receiver has been developed with radio towers and an unpaved access road
	North	Undeveloped desert with an unpaved road farther north
	East	Undeveloped desert
	South	Undeveloped desert with a highway and radio towers farther south
	West	Undeveloped desert with an unpaved road
1967	Subject Properties	Tract of the North Parcel - Former ELP RTR has been developed with a building and an unpaved access road
	North	Undeveloped desert with a compound of buildings and roads about 1000 feet farther north
	East	Undeveloped desert
	South	Undeveloped desert with a highway and radio towers farther south; little change since 1955
	West	Undeveloped desert with a paved road
1973	Subject Properties	Tract of the North Parcel - Former ELP RTR has a building and an unpaved access road; little change since 1967
	North	Undeveloped desert with a compound of buildings and roads about 1000 feet farther north; little change since 1967
	East	Undeveloped desert; little change since 1967
	South	Undeveloped desert with a highway and radio towers farther south; little change since 1967
	West	Undeveloped desert with a paved road; little change since 1967
1994	Subject Properties	Tract of the North Parcel - Former ELP RTR has a building and an unpaved access road; access road has been extended westward since 1973
	North	Undeveloped desert with a compound of buildings and roads about 1000 feet farther north
	East	Undeveloped desert; little change since 1973
	South	Undeveloped desert north of the highway; a community has developed south of the highway since 1973
	West	Undeveloped desert with a paved road; little change since 1973



**Aerial Photography**

As a part of the investigation of the Subject Properties, historical aerial photographs were obtained from EDR for the years 1936, 1942, 1967, 1974, 1988, 1995, and 2008. These aerial photographs of the Subject Properties were reviewed to determine the historical land use of the Subject Properties and the surrounding areas. A discussion of the information extracted from the aerial photographs is provided in the following table. Refer to Appendix B for reproductions of the aerial photographs.

<b>Aerial Photograph Year</b>	<b>Aerial Photograph Direction and Description</b>	
	<b>Direction</b>	<b>Description</b>
<b>1936</b>	Subject Properties	Undeveloped desert
	North	Undeveloped desert with a small developed compound about 1000 feet farther north
	East	Undeveloped desert
	South	Undeveloped desert with a highway farther south
	West	Undeveloped desert with an unpaved road
<b>1942</b>	Subject Properties	Undeveloped desert
	North	Undeveloped desert with a small developed compound about 1000 feet farther north
	East	Undeveloped desert
	South	Undeveloped desert with a highway farther south
	West	Undeveloped desert with an unpaved road
<b>1967</b>	Subject Properties	Both the South Parcel - ELP Remote Radio Receiver and North Parcel - Former ELP RTR tracts have been developed along with the adjacent access road
	North	Undeveloped desert with a large developed compound about 1000 feet farther north
	East	Undeveloped desert
	South	Undeveloped desert with a highway farther south
	West	Undeveloped desert with a paved road
<b>1974</b>	Subject Properties	The South Parcel - ELP Remote Radio Receiver tract remains developed while the North Parcel - Former ELP RTR appears to have been abandoned
	North	Undeveloped desert with a large developed compound about 1000 feet farther north
	East	Undeveloped desert
	South	Undeveloped desert with a highway farther south
	West	Undeveloped desert with a paved road



# EDDA Phase I Report – ELP Radio Receiver Sites

Aerial Photograph Year	Aerial Photograph Direction and Description	
	Direction	Description
1988	Subject Properties	Tract of the North Parcel - Former ELP RTR has a building and an unpaved access road; access road has been extended westward since 1974
	North	Undeveloped desert with a compound of buildings and roads about 1000 feet farther north
	East	Undeveloped desert; no change since 1974
	South	Undeveloped desert north of the highway; development has occurred south of the highway since 1974
	West	Undeveloped desert with a paved road; little change since 1974
1995	Subject Properties	Tract of the North Parcel - Former ELP RTR has a building and an unpaved access road; little change since 1988
	North	Undeveloped desert with a compound of buildings and roads about 1000 feet farther north
	East	Undeveloped desert; little change since 1988
	South	Undeveloped desert north of the highway; further development has occurred south of the highway since 1988
	West	Undeveloped desert with a paved road; little change since 1988
2008	Subject Properties	Tract of the North Parcel - Former ELP RTR has a building and an unpaved access road; little change since 1995
	North	Undeveloped desert with a compound of buildings and roads about 1000 feet farther north
	East	Undeveloped desert; little change since 1995
	South	Undeveloped desert north of the highway; further development has occurred south of the highway since 1995
	West	Undeveloped desert with a paved road; little change since 1995

## Soil Survey Review

The Subject Properties are located entirely on the following soil:

- Soil Component Name: Pendero-Copia-Nations complex
- Soil Surface Texture: loamy fine sand
- Hydrologic Group: Class A - high infiltration rates; deep, well drained to excessively drained soils
- Soil Drainage Class: excessively drained
- Hydric Status: not static
- Corrosion Potential - Uncoated Steel: moderate.

See the EDR Radius Report, Physical Setting Summary, for complete soil survey report.

## **5.5 Historical Use Information on Adjoining Properties**

Adjoining properties have been used for agricultural and communication towers. The Subject Properties are effectively surrounded by undeveloped desert and access roads.

## **6.0 SITE RECONNAISSANCE**

On November 8, 2012, Lockheed Martin (NISC III) conducted a site inspection of the Subject Properties and adjacent properties to determine their environmental condition. See Section 16 to review the site map/aerials. The following sections are based on observations made by Lockheed Martin (NISC III) during the site inspection.

### **6.1 Methodology and Limiting Conditions**

There were no limiting conditions present on the Subject Properties at the time of the site reconnaissance.

### **6.2 General Site Setting**

The Subject Properties are located in El Paso, Texas. The site is surrounded by undeveloped desert and accessed via an unpaved road from George Dieter Drive.

### **6.3 External Observations**

The North Parcel - Former ELP RTR tract is cleared and graded with sand and gravel and contains small amounts of miscellaneous debris. Two holes are present in the location of the post holes for the former fence gate. The South Parcel - ELP Remote Radio Receiver tract is cleared and graded with sand and gravel and contains small amounts of miscellaneous debris (e.g., short segments of insulated cable).

During the site reconnaissance in 2011, two small areas of stained sand were observed. The stained areas were approximately three square feet and sixteen square feet respectively. The stained areas were considered de minimis conditions as defined by ASTM Standard E 1527-05. The Parsons TSSC-III *Site Survey Report* recommended soil remediation and environmentally compliant disposal. As of November 8, 2012, the stained areas were not observed at the North Parcel - Former ELP RTR tract.

The site reconnaissance did not identify any manufacturing and process areas; chemical storage areas; hazardous waste storage areas; suspected disposal areas; subsurface structures such as drains, sumps, septic systems, and tanks; electrical equipment which may contain PCB; and evidence of historical uses. More information about PCB-containing equipment is provided in Section 12.3.

### **6.4 Interior Observations**

No structures are present on the Subject Properties.



## 7.0 INTERVIEWS

### 7.1 Interview with Owner

The owner (i.e., the Department of the Army) was not available at the time of the site reconnaissance.

### 7.2 Interview with Site Manager

The Environmental Professional interviewed the El Paso Terminal Radar System Support Center (SSC) Manager, Mr. Norvel Green via telephone on October 27, 2011. Mr. Green provided or noted the following:

- The *RTR Site Environmental Report: 22 Transformers, PCB, Lead, Asbestos Inspection* (see Appendix G)
- The Subject Properties were likely decommissioned in 1972
- The fuel tank associated with the North Parcel - Former ELP RTR engine generator was a diesel AST and has not been present at the site in decades.

Mr. Green served as the escort during the site reconnaissance conducted on November 8, 2012. Mr. Green has no knowledge of past or existing releases of hazardous materials.

### 7.3 Interviews with Occupants

No interviews were conducted with site occupants; the Subject Properties are not occupied.

### 7.4 Interviews with Local Government Officials

Lockheed Martin (NISC III) contacted the El Paso Fire Department to determine if there were any incidents or emergency responses at the Subject Properties. The Fire Department stated that there were no records and/or environmental concerns at this location.

### 7.5 Interviews with Others

Lockheed Martin (NISC III) interviewed the RECO from the CSA Real Estate. The RECO provided correspondence between the FAA and the Lessor revoking the Subject Properties leases with the intent of the sale of the property to a developer of military housing.

Lockheed Martin (NISC III) interviewed a project manager from Parsons TSSC-III, Mr. Andrew J. Fotino. Mr. Fotino provided information that Parsons contracted with Border Demolition and Environmental Inc. to conduct asbestos-containing materials (ACM) abatement and site structure demolition on September 14-21, 2012. Mr. Fotino provided the waste manifest for the ACM disposal.

## 8.0 FINDINGS

Key findings are summarized as follows:

- The Subject Properties consist of two tracts of land formerly containing FAA radio towers, receivers, and associated equipment and structures. The facilities were likely decommissioned by 1972. Although the Lessor had stated that the building and concrete foundations on the Subject Properties could remain in place, the Subject Properties have been cleared and graded and are currently vacant.
- The Subject Properties are leased from the Department of the Army (Fort Bliss). The Lessor has revoked the Subject Properties leases with the intent of the sale of the property to a developer of military housing.
- No indications of improper dumping, releases, or recognized environmental conditions on the Subject Properties were conveyed during interviews conducted with representatives of the FAA.
- The Subject Properties were not listed in the federal or state environmental databases that were searched.
- One operational retail fuel station, Valero Corner Store, is located within 1/8-mile of the Subject Properties. Fort Bliss is a Department of Defense facility. One CESQG and one RCRA transporter are located within one mile of the Subject Properties. No releases or other enforcement information for adjacent properties was listed in the federal or state environmental databases that were searched.
- An asbestos, lead, and PCB survey was performed on the Subject Properties in July 2011 (see Appendix G). The PCB-containing transformers and other electrical equipment were removed for disposal on October 7, 2011. The ACM and lead-based paint were removed and disposed of during demolition activities in September 2012. Waste manifests are provided in Appendix H.

## 9.0 OPINIONS

There is no indication that FAA operations on the Subject Properties have caused any adverse environmental effects. Also, there is no indication that FAA activities on the Subject Properties have contributed to any environmental concerns on adjacent properties. Furthermore, there is no indication that operations and conditions on adjacent properties have caused any adverse environmental effects to the Subject Properties.

## 10.0 CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard E 1527-05 of the Subject Properties located east of George Dieter Drive and north of Montana Avenue, El Paso, Texas 79916. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the Subject Properties.



## 11.0 DEVIATIONS

This EDDA was performed with no deletions or deviations from ASTM Standard E 1527-05 and FAA Order 1050.19B, except as specified in Section 12.0.

## 12.0 ADDITIONAL SERVICES

Information in Sections 12.1, 12.2, and 12.3 below is based on the *RTR Site Environmental Report: 22 Transformers, PCB, Lead, Asbestos Inspection*, August 16, 2011, prepared by ENCON International, Inc. (ENCON). The full report is available in Appendix G. Additional information is based on the Parsons TSSC-III, *Site Survey Report*, May 16, 2012 and ACM waste manifest from September 2012.

### 12.1 Asbestos

No sampling was done as part of this Phase I EDDA. An asbestos inspection was conducted at the Subject Properties by ENCON on July 25, 2011, and documented in a report dated August 16, 2011. Asbestos was detected in the building materials sampled, including in the expansion joint compound, door caulking, and the floor tile and mastic. Floor tile at the South Parcel - ELP Remote Radio Receiver tract was also ACM. One waste manifest for disposal of non-friable material, one barrel, and one cubic yard, was provided to the Environmental Professional. The waste was picked up from the Subject Properties on October 7, 2011, and delivered to the Otero/Lincoln County [New Mexico] Regional Landfill on October 20, 2011. The waste manifest does not document which materials were removed from the Subject Properties. The Environmental Professional observed the ACM described in the inspection report as present at the Subject Properties on October 20, 2011.

The Parsons TSSC-III *Site Survey Report* documented approximately 649 square feet of green floor tile, mastic, door caulking and expansion joint compound as presumed ACM. One waste manifest for disposal of non-friable material, 39 bags, 560 pounds, two cubic yards, was provided to the Environmental Professional. The waste was picked up from the Subject Properties on September 17, 2012, and delivered to the Otero/Greentree Regional Landfill on September 28, 2012. The waste manifests are available in Appendix H.

### 12.2 Lead

No sampling was done as part of this Phase I EDDA. A lead-based paint survey was conducted at the Subject Properties by ENCON on July 25, 2011, and documented in a report dated August 16, 2011. Using a NITON X-ray Fluorescence (XRF) analyzer, fifteen (15) of the thirty-five (35) readings tested at or above the 0.3 milligrams per square centimeter detection limit. Lead-based paint could create an inhalation or soil contamination hazard if the paint is turned into dust by abrasion, scraping, or sanding. The Parsons TSSC-III *Site Survey Report* documented the presence of lead-based paint and recommended disposal at a certified landfill/facility. Parsons does not have any documentation of building demolition activities and the management of lead.



### 12.3 PCB-Containing Equipment

No sampling was done as part of this Phase I EDDA. ENCON sampled the contents of twenty-two (22) pieces of equipment present at the Subject Properties on July 26 and 28, 2011, and documented in a report dated August 16, 2011. Four of the items tested were found to have oils that were above detectable limits for PCB. None of the transformers would be classified as “PCB Transformers” under U.S. Environmental Protection Agency (EPA) regulations because the levels of PCB were below 500 ppm. The 22 electrical transformers, capacitors, regulators, and rectifiers were collected and disposed by TCI of Alabama, LLC via a Uniform Manifest dated October 7, 2011. The Uniform Manifest is available in Appendix H.

### 12.4 Radon

Radon levels were not quantitatively obtained during the site investigation. According to the EPA radon map, El Paso County is located in Zone 3. The predicted average indoor radon screening level is less than 2 pCi/L.

### 12.5 Historic Value

The National Historic Preservation Act (NHPA), as amended in 16 United States Code (USC) 470, is the fundamental law for the protection, rehabilitation, restoration and reconstruction of cultural resources. Section 106 of this Act requires that federal agencies take measures to protect properties eligible for or included in the National Register of Historic Places (NRHP). Other statutes, such as the Archaeological Resources Protection Act (16 USC 470aa-470ii), protect non-structural properties of historic importance. Research indicates that the Subject Properties does not contain any structures or areas that qualify for protection as related to the above-referenced statutes. During the site reconnaissance, no such NRHP sites were observed. A review of the NRHP did not reveal any information to suggest that the Subject Properties would be covered under the above-referenced statutes.

## 13.0 REFERENCES

ASTM International, *ASTM E1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, West Conshohocken, PA, November 2005.

Border Demolition and Environmental Inc., Waste Manifest for Shipment of Asbestos Waste to Otero/Greentree Regional Landfill, September 17, 2012.

ENCON International, Inc. (ENCON), *RTR Site Environmental Report: 22 Transformers, PCB, Lead, Asbestos Inspection*, prepared by August 16, 2011.

Environmental Data Resources, Inc., *EDR Radius Map Report with GeoCheck*, Inquiry Number 3187874.2s, October 17, 2011.

Environmental Reconditioning, Inc., Waste Manifest for Shipment of Asbestos Waste to Otero/Lincoln County [New Mexico] Regional Landfill, October 7, 2011.



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Parsons TSSC-III, *Site Survey Report*, Demolish, Remove, and Dispose of the ELP BLDG, El Paso, TX, May 16, 2012.

TCI of Alabama, LLC, Uniform Manifest for Electrical Equipment, October 7, 2011.

The information regarding EPA enforcement and compliance history was obtained from the EPA ECHO website: <http://www.epa-echo.gov/echo/>.

The NWI map was obtained from the National Wetlands Inventory website: <http://wetlands.fws.gov>.

The information regarding radon zone was obtained from the EPA website: <http://www.epa.gov/radon/zonemap.html>.

The information regarding historic resources was obtained from the NRHP website: <http://www.nr.nps.gov>.

### 14.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONAL

This EDDA was performed in accordance with ASTM Standard 1527-05 and FAA Order 1050.19B. The methodologies contained in these standards and orders include, among other things, interviews with individuals familiar with the Subject Properties, site reconnaissance and historical records review. Information obtained during the interviews and site reconnaissance was recorded and reviewed before being included in this EDDA report. All information obtained during the site investigation and subsequently included within the EDDA is assumed to be reliable. The purpose of this investigation is to provide FAA with information regarding any existing or potential environmental concerns on or surrounding the audit site. The following signature attests to these statements:

(b) (6)		January 29, 2013
(b) (6)	Booz Allen Hamilton (NISC III)	Date:

I, (b) (6) with Booz Allen Hamilton (NISC III), declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in §312.10 of 40 CFR 312.

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Properties. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

(b) (6)		January 29, 2013
(b) (6)	Lockheed Martin (NISC III)	Date:

I, (b) (6) with Lockheed Martin (NISC III), declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in §312.10 of 40 CFR 312.

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

## 15.0 QUALIFICATION OF ENVIRONMENTAL PROFESSIONAL

To the best of his professional knowledge and belief, (b) (6) of Booz Allen Hamilton meets the definition of environmental professional as defined in §312.10 of 40 CFR 312. Mr. Furr has the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Properties. (b) (6) education and professional experience is summarized as follows.

### Education

(b) (6)

OSHA 40-hour HAZWOPER Training, September 2001

ASTM International Technical & Professional Training, Environmental Site Assessments for Commercial Real Estate, June 2005

ASTM International Professional Workshop, What You Need to Know as a Phase I Environmental Professional that Is Not in the ASTM E1527 Standard, October 23, 2012

### Summary of Professional Experience

(b) (6) is an environmental scientist and has more than 15 years of professional experience with Booz Allen Hamilton providing technical and program management support to environmental and safety programs of federal agencies. (b) (6) provides environmental, occupational safety, and health (EOSH) compliance support for facilities and laboratories for numerous federal agencies, including the FAA, EPA, FDA, GSA, NIST, and the Architect of the Capitol. (b) (6) has extensive experience in performing environmental due diligence assessments, National Environmental Policy Act (NEPA) reviews for federal actions, and facility EOSH compliance audits. (b) (6) has conducted EDDAs and other due diligence assessments for civilian federal agencies for more than ten years, and participated in the FAA workgroup to develop FAA Order 1050.19B.

(b) (6) has assisted with this EDDA in a professional manner using the degree of skill and care exercised for similar projects under similar conditions. (b) (6) has prepared FAA EDDAs, and since 2010 served as the EDDA Program Field Manager. He has over 10 years experience in the construction, engineering and environmental fields with successful completion of the ASTM Phase I-II Environmental Site Assessments for Commercial Real Estate certification course. He has developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



## 16.0 SITE MAP AND INTERVIEW DOCUMENTATION

### 16.1 Site (Vicinity) Map

The site vicinity map below shows the Subject Properties (i.e., North Parcel - Former ELP RTR, South Parcel - ELP Remote Radio Receiver) and Valero Corner Store which is located south of Montana Avenue.



### 16.2 Interview Documentation

NAME	TITLE	RELATIONSHIP TO THE SUBJECT PROPERTIES	INTERVIEW TYPE	PHONE NUMBER
(b) (6)	EOSH Professional	Site Assessor	Performed site reconnaissance	(b) (6)
	EOSH Professional	Site Assessor	Performed site reconnaissance	
	El Paso Terminal Radar SSC Manager	SSC Manager	Phone	

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NAME	TITLE	RELATIONSHIP TO THE SUBJECT PROPERTIES	INTERVIEW TYPE	PHONE NUMBER
(b) (6)	RECO	CSA Real Estate	Phone	(b) (6)
	Project Manager	Parsons TSSC-III	Email	
	Senior Office Assistant	El Paso Fire Department	Phone	

## 16.3 Special Contractual Conditions between User and Environmental Professional

There are no contractual conditions existing between the User and Environmental Professional.